

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

D. G. Sweigert, Pro Se Counter-Plaintiff	PRO SE
-against-	21-cv-10878-AT-JLC
Jason Goodman, Pro Se Counter-Defendant	District Judge Analisa Torres
	Magistrate Judge James L. Cott

**DEFENDANT’S CONDITIONAL COUNTERCLAIM AGAINST JASON GOODMAN
(COUNTER DEFENDANT)**

[JURY TRIAL DEMANDED]

The *pro se* Defendant-Counter Plaintiff (undersigned) files these papers as conditional upon a finding of personal jurisdiction by this Court upon the undersigned. *Wafios Machinery Corporation v. Nucoil Industries Co., Ltd.*, 03 Civ. 9865 (RWS) (S.D.N.Y. Jul. 21, 2004). If no personal jurisdiction is established against the undersigned by this Court these papers should be considered moot. Conditional ANSWER filed concurrently with these papers.

February 21st, 2023 (2/21/23)



**D. G. SWEIGERT PRO SE DEFENDANT, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719**

DEFENDANT, COUNTER PLAINTIFF, SWEIGERT'S COUNTERCLAIM

Pro se Defendant D. G. Sweigert, who does not waive his right to challenge this Court's personal jurisdiction over him, now responds as a conditional Counter-Plaintiff and asserts his COUNTERCLAIM as follows:

NOW COMES THE PRO SE COUNTER PLAINTIFF D. G. SWEIGERT to provide this Honorable Court with a conditional counterclaim complaint for damages in excess of \$75,001.00 that describes Article III damages in which a jury trial is demanded.

FACTS COMMON TO ALL COUNTERCLAIMS

Goodman and Webb as Russian Propogandists

1. The U.S. District Court for the Michigan Eastern District (M.I.E.D.) and the Southern District of New York (S.D.N.Y.) are all too familiar with Jason Goodman ("Goodman") and his former room-mate George Webb Sweigert ("Webb"). Both are pro-Kremlin, alt-right, social media mouthpieces (openly pro-Russia concerning the conflict with the Ukraine) and have ties to suspected state operated Russian disinformation operations. Both are experts at social media hoax news stories, creating cyber mobs, gang-stalking victims and running smear campaigns. Both are Russian propogandists and use propaganda techniques against their enemies accordingly. Both have appeared extensively on the Alex Jones conspiracy network INFOWARS and have created hoax news stories for the national media.
2. Both were present at the U.S. Capitol building January 6, 2021 cheerleading insurrectionists on social media and were predominantly featured in social media podcasts.

Both announced and heavily encouraged “patriots” to travel to Washington, D.C. on 1/6/2021 for the mob attack on the U.S. Capitol. Both are friendly and familiar with the Cliven Bundy family that sponsored an armed insurrection near Las Vegas, Nevada in 2014. Both thrive by inciting devastating real-world consequences with the lies they publish as “news.” Both have subjected innocent people to relentless threats of violence and death, bullying, and online harassment. Both have pushed Q-Anon based conspiracy theories to target government officials. Without any training or credentials in journalism both demand that they be treated as “investigative journalists” instead of what they are – conspiracy theorists.

3. On several occasions CrowdSource the Truth (CSTT) sponsored joint podcasts with the conspiracy channel, hosted by Alex Jones, known as “INFOWARS” (caveat: a former INFOWARS reporter, Joseph Randall Biggs, was arrested on 1/20/2021 for his involvement in the 1/06/2021 Capitol insurgency [<https://www.justice.gov/opa/page/file/1357251/download>]).

4. Likewise, Mr. Jones has appeared on the Counter Defendant’s Multimedia System Design, Inc. (M.S.D.I.’s) d/b/a 21st Century 3D podcast known as CrowdSource The Truth channels 2 and 3 on YouTube.COM for the purposes of peddling far-right extremism and radicalization.

5. Goodman, whose former wife is Russian-Ukrainian, makes extensive appearances on Russian owned state media “SPUTNIK RADIO” with his “lifelong friend”, SPUTNIK full-time employee Lee Stranahan of Sioux Falls, South Dakota. Stranahan admits he “is paid by the Russians” and is a close friend of Brad Parscale, the former director of social media operations for the TRUMP FOR PRESIDENT campaign. Goodman’s former attorney in a lawsuit, in which the presiding judge labeled Goodman as a “conspiracy theorist”, also represents Felix Sater in a thorny legal action involving Russian money laundering.

6. Goodman also publishes cartoons of the undersigned's father on Twitter as "GHenryDickFace", in an attempt to disgrace the military service of George H. Sweigert, Staff Sergeant, U.S. Army with service in World War II in the South Pacific at Guadalcanal, Bougainville, the Fiji Islands, the liberation of Manilla, New Guinea and other combat operations involving the 37th Division of the U.S. Army.

<https://twitter.com/GHenryDickface>





7. Goodman is openly hostile and disrespectful to the U.S. military and often states that Adolf Hitler should have his own YouTube channel, which showcases his alignment with the white supremacy movement and Neo-Nazi alt-right groups. To this end, Goodman's father was an apparent non-combat peacetime medical doctor in the U.S. Naval Reserves in an exchange program for military funding of his medical school expenses. Goodman's father then became a Medicare federal contract submitting millions of dollars in health care claims of a dubious nature. Goodman was raised as a spoiled and entitled "film school" student and went on to Hollywood to help make feature films about serial killers carving up their victims with gore and disgusting violence.

8. Stranahan is a former employee of the website Breitbart News and a current employee of RT, a Russian state funded and -operated television network that was recently forced to register with the Department of Justice as a foreign agent. Stranahan operates the Citizen Journalism School, the corporate structure of which is currently unknown. Defendant Stranahan also

operates the political journalism website The Populist, where he solicits donations via a PayPal account registered to Stranahan Strategies, LLC. He has a long history of creating fabricated hoax news. (<https://www.youtube.com/watch?v=SkgWXIjBEIU> and <https://www.youtube.com/watch?v=fhniP-mAChI>)

9. Webb, who in the recent past has paid Stranahan \$5,000.00 in two (2) credit card transactions, has completed a 2022 six-month tour of Eastern Europe as a “headliner” to appear in pro-Russian social media podcasts to push the conspiracy theory that the invasion of the Ukraine by Russia was justified to secure “biological weapons labs”. (<https://twitter.com/RealGeorgeWebb1>) Webb has broadcasted his video content from Poland, Romania and Slovenia to name a few of the former Iron Curtain satellites of Russia. Webb has been extensively quoted by media outlets linked to the Chinese Communist Party. (<https://www.globaltimes.cn/content/1183658.shtml>). Webb has admitted to extensive travels in Eastern Europe in the 1980’s with his deceased father-in-law from Portland, Oregon (<https://obits.oregonlive.com/us/obituaries/oregon/name/vernon-burda-obituary?id=13102470>) to traffic young women refugees for unknown purposes.

10. Webb has displayed a life long hatred for the military service of his father, George H. Sweigert, and aligned with Goodman when he moved into Goodman’s apartment in New York City in May 2017. For about four months, both Webb and Goodman distributed social media videos from Goodman’s apartment and traveled together to create fake hoax news stores (e.g. that Amtrak operated a stolen car ring transporting vehicles between Lorton, Virginia and Sanford, Florida). The closeness of Webb and Goodman fueled rumors that both were openly bisexual as a strong level of intimacy and sharing was displayed between the two in video productions as “lovers” until a “spat” caused Goodman to lock Webb out of his apartment.

During this time of Webb's exile from the apartment, Goodman sequestered Webb's laptop computer for a week to allegedly collect photographs of alleged sexual activity upon which Goodman could blackmail Webb. Goodman has admitted in his video productions that he had approximately 500 naked photos of himself on his laptop computer and a video of pleasuring himself. Webb admitted that at one time he was a sex slave, aka male prostitute to political figures.

11. The Goodman laptop blackmail story was apparently confirmed by Webb's "girlfriend" Corean Elizabeth Stoughton of Fort Meade, Maryland, the daughter of Ron Stoughton, a so-called co-inventor of the Internet protocol "TCP/IP" (1968 - The Network Working Group met for the first time...Elmer Shapiro (Stanford Research Group) chaired and others at the meeting included Steve Carr, Ron Stoughton, Steve Crocker and Jeff Rulifson).

12. Goodman established a relationship with Corean Elizabeth Stoughton and was able to have Stoughton obtain access to Webb's laptop while the two lived together in the area of Capitol Heights, Maryland. In fact, Stoughton paid \$1,500 for two (2) theatre tickets for her and Webb to attend the theatrical play "Hamilton" at the Kennedy Center for the Performing Arts in Washington, D.C. Ms. Stoughton is a willing participant in the racketeering enterprise and joined with full knowledge of Goodman's illegal activities.

13. During this time (Spring 2020) Stoughton coordinated with the husband of Maatje Benassi (so-called "patient zero" in COVID-19 propaganda published by Webb and the Chinese Communist Party). Stoughton admitted to coordinating with Benassi's husband and Donie O'Sullivan of the Cable News Network to fabricate a story which placed Webb as the center-piece of the COVID-19 patient zero hoax news story, for which O'Sullivan received a so-called EMMY Award (<https://www.irisht Examiner.com/lifestyle/people/arid-40347206.html>) from

The National Academy of Television Arts and Sciences, Inc. (NATAS). This COVID-19 “patient zero” story was a fabrication by Goodman and Stoughton in tandem with Mr. Benassi and O’Sullivan (see sham and hoax legal action filed by Webb in the Eastern District of Michigan (M.I.E.D.) against C.N.N.).

14. Like Webb, Goodman pushes conspiracy theories in his so-called private Internet “racketeering enterprise” consisting of a dozen “valuable” social media properties, such as accounts on Twitter, YouTube, Patreon, Rumble, BitChute, Odysee, SubscribeStar, etc. Goodman asserts that these properties are owned, controlled or operated by either Goodman or his fictional d/b/a “21st Century 3D” an assumed named assigned by the Secretary of State for New York State (NYS) to Goodman’s Multimedia Systems Design, Inc. (M.S.D.I.). The racketeering enterprise has a corporate entity (M.S.D.I.) and a brand identification (CSTT). Stranahan and Webb are both willing participants in the racketeering enterprise and joined with full knowledge of Goodman’s illegal activities.

15. Goodman’s social media broadcasts, to include the “Russian biolab security” narrative, have included extensive LiveStream interviews with Stranahan and John Mark Dougan (an American fugitive embedded within active Russian combat military forces fighting in the Ukraine) push knowingly false information disguised as “news”. Goodman, Stranahan and Webb have justified the Russian invasion of the Ukraine as a special police safety action to secure supposed bio-weapons labs. The trio are anti-U.S. Government and pro-Putin.

16. Goodman’s CrowdSource The Truth (CSTT) Internet private virtual racketeering enterprise (encompassing Twitter accounts, BitChute, Rumble, Odysee, Patreon, YouTube, SubscribeStar, etc.) distributes innumerable hoax and fake news stories with the help of Charles Ortel, code named “The Turd Man”, that include COVID-19 antivax and 2020 stolen election

narratives designed to incite anti-government viewers to become paid subscribers using their credit cards. The act of electronically distributing these videos (numbers in the thousands) are predicate acts of wire fraud as they are designed to defraud the targets (such as the undersigned and other defendants) and the public at large.

17. Stranahan, Webb and Goodman's broadcasts are designed to create false reports of crime to inflame cyber mobs to attack Goodman's enemies and settle personal scores, to include an employee of the M.I.E.D. Court Richard Loury, or the former U.S. Department of Homeland Security (D.H.S.) employee defendant Nina Jankowicz, or of the President of the EMMY Awards defendant Adam Sharp. Stranahan and Webb are culpable with Goodman in the wire fraud transmission of these electronic artifices of fraud. Patreon, SubscribeStar and Odysee aid and abet the wire fraud scheme by processing credit card transactions from the general public.

18. Goodman, acting in his personal capacity and as agent for the CrowdSource the Truth (CSTT) racketeering enterprise, has stated many times in video broadcasts that the CSTT enterprise must be protected from persons like the Counter Plaintiff who represent a "threat" to the Constitution and the American way of life. To this end Goodman uses the CSTT enterprise to push the "COUNTER LAWFARE REPORT" to accuse the undersigned of criminal acts. Goodman works with his dupe, George Webb, to implicate the undersigned in triangulation litigation that paints the undersigned as a "professional hacker", criminal, practicing law without a license, engaged in wire fraud, etc.

19. Stranahan, Goodman and Webb work together to operate a racketeering enterprise via the use of wire fraud to collect monies via the general public for fraudulent "news reports" that have attacked the undersigned and many others. The racketeering enterprise relies on Webb,

Goodman, Stranahan, 21st Century 3D and M.S.D.I. operating in a collective with their dupes at paid credit card service bureaus at Patreon, SubscribeStar and Odysee.

20. The racketeering business model of a CSTT subset is the “COUNTER LAWFARE REPORT”. This racketeering enterprise, with Goodman and Webb as agents, file bad-faith sham documents in various litigation forums to enable Goodman and his racketeering enterprise to disseminate the false and damaging material contained in the sham document (e.g. Amicus Curie Brief) to thousands of viewers for profit. This tactic allows Goodman to announce and tease that “criminal allegations” (contained in the sham documents) will be discussed on his private club subscriber member video services (Patreon, SubScribeStar and Odysee). In Goodman’s mind this allows him immunity under New York State’s litigation privilege law. It doesn’t, as the malicious prosecution exemption forecloses such immunity.

21. Both Goodman and Webb initiate sham litigation for the purposes of selling fake news that defrauds the public and settling personal scores and to garner views, donations, credit card paying subscribers, etc. As in this legal action involving both Goodman and Webb, their tactic allows triangulation and ensnares unsuspecting persons, like the undersigned or Chris Bouzy or Richard Loury or Adam Sharp, into a litigation cross fire. To this day, the undersigned suffers the effects of this character assassination: his career as a professional cyber security expert has been compromised and his social relationships have been irreversibly damaged.

22. Fact-based journalism is essential to our democracy, because it provides citizens with objective, reality-based information on issues of public concern. Webb, Goodman and Stranahan are not fact-based journalists. They are merely unemployable grifters that haunt the Internet looking for more victims using their skillful talents in deceit. This trio spread lies to construct false narratives that terrify a gullible audience, all in a desperate attempt to generate

revenue and momentum for a hateful agenda. The First Amendment necessarily creates space for democratic debate, but it does not and cannot protect the spread of deliberate lies driven by hate and designed to incite violence against private citizens.

Goodman's re-litigation of Michigan claims in New York

23. Recently the Counter Plaintiff, "Webb's" brother, was named as a new defendant in a year-old sham legal action brought by Goodman in the S.D.N.Y. against Webb and a third-party Christopher E. Bouzy. *Goodman v. Bouzy*, et. al. Case No. 1: 21-cv-10878-AT-JLC, S.D.N.Y., Hon. Analisa Torres presiding.¹ The undersigned attempted to warn the Court in the very early stages of the legal action but had his documents stricken from the record in what appeared to be a reactionary decision by judge Torres.

24. Meanwhile, Christopher Bouzy (original defendant with Webb) is an apparent social media expert that is employed by law firms for his expertise in automated social media smear campaigns who is now pinned down in the litigation cross fire. This is a bad faith legal action designed to ensnare other co-defendants such as the attorneys for Chris Bouzy (original defendant with Webb) and his company Bot Sentinel, Inc., into the triangulation of sham litigation created by both Webb and Goodman. Goodman is employing an extortion technique on the law firm Ballard Spahr and the attorneys that represent Mr. Bouzy. It is the threat of continuous sham litigation and social media campaigns that is used to coerce person with a reputation to protect to simply pay-off Goodman.

25. Case in point, when Goodman first encountered a Copyright Strike from Adam Sharp of the EMMY Awards he immediately launched into a public smear campaign in the Fall of 2020. Goodman then pushed the social media smear campaign onto the attorneys representomng the

¹ Filed in the S.D.N.Y. as docket ECF no. 100, 1/18/2023.

EMMY Awards with the apparent hope of extorting settlement monies. After two legal actions in the S.D.N.Y. (and a pending appeal in the U.S. Court of Appeals for the Second Circuit) Goodman has implicated the presiding judge (Valerie E. Caproni) and Adam Sharp in a criminal conspiracy as articulated in what Goodman calls his “Twitter Files”, openly pushed by Charles “Turd Man” Ortel. The message is clear, satisfy Goodman’s coercive threats or be prepared to have your professional reputation destroyed with sham litigation and the accompanying social media reports of Goodman’s on-going investigation into your criminal misconduct. Both Stranahan and Webb (and perhaps Ortel) understand this scheme and willing participate as racketeering agents in it.

26. While actively avoiding service in a pending legal action in the M.I.E.D. brought by the undersigned, Goodman is attempting to gain more views and associated donations and monies by re-litigating issues settled in the Michigan M.I.E.D. Court so that he can continue to defraud the undersigned by destroying his professional reputation as a cyber security expert.

27. Goodman’s latest hoax gambit is the overlapping and redundant second amended complaint (SAC) filed in this action that conflicts with the jurisdiction of the M.I.E.D. Goodman filed the SAC 2/17/2023 in *Goodman v. Bouzy* (appearing as ECF doc. 132, 2/17/23 in this action) as a re-litigation hoax designed to obtain financial monies from the public and to defraud the undersigned of honest services of the M.I.E.D. Court (a racketeering predicate). (*For example, see* M.I.E.D. 2:22-cv-10002-GAD-KGA *Sweigert v. Goodman*, Hon. Gershwin A. Drain, presiding; *note* ORDER 22-cv-10002 (E.D. Mich. Apr. 1, 2022)). Meanwhile, Webb has done likewise.

28. George Webb is also attempting to re-litigate the M.I.E.D. Court’s findings in an action in the Northern District of Georgia (his amended complaint attached in the accompanying

exhibits annex). *See Sweigert v. C.N.N.*, 1:22-CV-02946-SEG. Re-litigation is another common tactic for Russian propagandists like Webb and Goodman who use their sham lawsuits to re-write history as they discuss their legal cases on social media with thousands of viewers. Otherwise, they have nothing to talk about.

29. Goodman has formally alleged, and presumably expects to litigate, Michigan matters in the S.D.N.Y. concerning M.I.E.D. Court employee Richard Lory, who should be in jail, according to Goodman's broadcasts in his virtual private racketeering enterprise, for committing criminal acts of forgery as defined by the laws of the State of Michigan (a conspiracy to file forged court documents). Goodman has even visited the Detroit Police Department and the Detroit field office of the Federal Bureau of Investigation in an attempt to have Lory and the Counter Plaintiff arrested. In Goodman's own words (from his second amended complaint in *Goodman v. Bouzy*): (ECF no. 100).

55. Defendants caused a fraudulent pleading to be transmitted to the U.S. District Court for the MIED in violation of 18 U.S. Code § 1343, 18 U.S. Code § 1503, and 18 U.S. Code § 1512 when Lory altered the date of a pro se pleading filed with the Court on June 21, 2021, attributed to Webb but authored by Lory at Sweigert's direction.

Filed as ECF doc. 132, 2/17/2023

Goodman's Pattern and Practice

30. Make no mistake, the lives of the Counter Plaintiff, presumably Lory and others, are irreversible impacted by Goodman's vicious social media attacks and wire fraud launched via his proxy companies and agents (Stranahan and Webb). It is instructive to note that Goodman directed a cyber mob in May 2022 to hound and harangue a pregnant federal civil servant

employed by the U.S. Department of Homeland Security (D.H.S.) named Nina Jankowicz (an expert in Russian propaganda and author of the book “*How To Lose The Information War, Russia, Fake News and the Future of Conflict*”, published by I.B. Tauris, London, 2020) who endured at least two (2) late night telephone calls by Goodman, who broadcasted the calls to thousands on his social media podcast shows. Apparently both defendants Nina Jankowicz and Ben Wittes have been forced to obtain civil protection orders from the Arlington (Virginia) General District Court (<https://www.vacourts.gov/courts/gd/arlington/home.html>) against Goodman for his apparent on-line threatening behavior.

31. Jankowicz was hounded in the exact same manner as a U.S. State Department employee in the lawsuit brought against Alex Jones and Stranahan (which both lost) <https://www.courtlistener.com/docket/6333356/gilmore-v-jones/>. This time Goodman’s video productions (which included late night phone call recordings to Jankowicz) were rebroadcasted on the notorious Alex Jones controlled *Banned.Video* conspiracy platform. The M.I.E.D. presiding judge, Gershwin A. Drain, admonished Goodman for his telephone calls to M.I.E.D. Court staff and spouses at their homes during off business hours (usually at 11 p.m.). (*See Sweigert v. Goodman*, 22-CV-1002, Show Cause hearing March 4, 2022, ORDER of 2/11/2022). Soon after the Goodman phone calls and cyber mob video that featured Jankowicz and the Counter Plaintiff (published on “battleplan.news” and “banned.video”, Alex Jones affiliated media properties) Jankowicz was forced to quit her D.H.S. job, which gave Stranahan an opportunity to praise Goodman’s antics.



Jason Goodman
@JGoodman_CSTT



Will Twitter allow me to tweet this from InfoWars?



infowars.com

DisINFO DIVA Nina Jankowicz Reveals She's Been Working ...
Host of Crowdsourc the Truth reaches out to Ministry of
Truth czar for interview.

5:15 PM · May 12, 2022 · Twitter for iPad



Lee Stranahan @stranahan · 11h



Russia state-affiliated media

Congratulations to @JGoodman_CSTT Nina Jankovich, a VERY big scalp.

1

2

21



Jason Goodman @JGoodman_CSTT · 11h



Thank you Lee. If people haven't yet seen the report...



battleplan.news

Disinfo Diva or Dangerous Double Agent: Who is N...
Is Nina Jancowicz merely a frustrated Broadway
showtunes songstress or is she a dangerous ...

1

5

16



Disinfo Diva or Dangerous Double Agent: Who is Nina Jankowicz?

25,228 views · May 18, 2022

25 Share Download

Is Nina Jancowicz merely a frustrated Broadway showtunes songstress or is she a dangerous subversive operative working to undermine the U.S. government from within? In this report, Jason Goodman of Crowdsource the Truth reveals unimpeachable evidence indicating Nina may actually work for the Zelenskyy government, has received numerous payments to a shadowy LLC from non-U.S. NGOs and has failed to register under the foreign agent registration act. Hear Nina herself, and her colleagues at The Brookings Institution, The Wilson Center and others as Goodman teases out admissions that almost certainly lead to the immediate dissolution of the Orwellian Disinformation Governance Board. Produced by CrowdSourceTheTruth.com

<https://banned.video/watch?id=62852a24d04a760673700d2c>

<https://battleplan.news/watch?id=62852a24d04a760673700d2c>

The screenshot shows a video player interface. At the top, there is a search bar and a navigation menu. The main content area displays the title of the report, the author's name (Dave Sweigert), and an abstract. A video thumbnail of a man speaking is visible on the right. Below the video, there are social media sharing options and a 'SUBSCRIBE' button.

BANNED video

Search

to support disaster response and recovery and make a Cyber Militia a reality

January 2014

Author: Dave Sweigert, M.Sci., CISSP, CISA, PMP

ABSTRACT

Private organizations would be well advised to be aware of the involvement of National Guard cyber warfare units in responding to attacks infrastructure. Increased interaction with Guard units may be ap entities concerned with community-wide cyber resiliency.

Background

CROWDSOURCE THE TRUTH

accomplish political obje Chinese Eagle Union Has one example of a "Cyber M

Disinfo Diva or Dangerous Double Agent: Who is Nina Jankowicz?

22,780 views · May 18, 2022

Special Reports

Is Nina Jancowicz merely a frustrated Broadway showtunes songstress or is she a dangerous subversive operative working to undermine the U.S. government from within? In

19 Share Download

SUBSCRIBE

The screenshot shows a tweet from Jason Goodman (@JGoodman_CSTT). The tweet text discusses an exposé about Nina Jancowicz and mentions her work for the Zelenskyy government. It includes links to a subscribestar.com post and a patreon.com post. The tweet features a video thumbnail showing a person in a military-style uniform with a 'A30B' patch.

RET JONES (FULL) Wednesday 5/18/22 • White House OVERWHELMED by Americans Awakened to The Great Reset

← Tweet

Jason Goodman
@JGoodman_CSTT

#ICYMI last night's exposé revealed stunning facts about @wiczipedia and who she actually works for. She must be prosecuted for FARA and other violations
subscribestar.com/posts/608458
patreon.com/posts/disinfo-...

INFO INFO WARS WARS

A30B

PARTIES

32. **NON-PARTY MULTIMEDIA SYSTEM DESIGN, INC. (M.S.D.I.)**. Goodman is fond of playing legal flipflop between two (2) entities; (a) as the sole owner of M.S.D.I., which has obtained an assumed name certificate as (b) 21st Century 3D in New York State (see Twitter handle @21C3D).

33. At all times alleged herein Goodman is/was exercising and discharging his duties as a representative of M.S.D.I. / 21st Century 3D (aka Agent Goodman) engaged in a for profit enterprise racketeering known as CrowdSource The Truth (CSTT), an interchangeable phrase with 21st Century 3D, and/or M.S.D.I. (aka racketeering enterprise). As stated in his S.D.N.Y. amended complaint, Goodman mistakenly expects these corporate fictions to provide him immunity from litigation under the Communications Decency Act, 47 U.S. Code § 230.

CROWDSOURCE THE TRUTH - Trademark Information

By **Multimedia System Design, Inc**



The CROWDSOURCE THE TRUTH trademark was assigned a Serial Number #87752970 – by the United States Patent and Trademark Office (USPTO). Trademark Serial Number is a Unique ID to identify the CROWDSOURCE THE TRUTH mark in USPTO. The CROWDSOURCE THE TRUTH mark is filed in the category of Education and Entertainment Services . The legal correspondent for CROWDSOURCE THE TRUTH trademark is MULTIMEDIA SYSTEM DESIGN, INC, 252 7TH AVENUE, 6S NEW YORK, NY 10001 . The current status of the CROWDSOURCE THE TRUTH filing is **REGISTERED**.

Based on Multimedia System Design, Inc, the CROWDSOURCE THE TRUTH trademark is used in the following business: Providing on-line videos featuring news in the nature of current event reporting, not downloadable .

<https://www.trademarkelite.com/trademark/trademark-detail/87752970/CROWDSOURCE-THE-TRUTH>

34. M.S.D.I. has been sued as a legal entity in the S.D.N.Y. action *The National Academy of Television Arts and Sciences, Inc. et al v. Multimedia System Design, Inc.*, 20-cv-07269-VEC-OTW, Hon. Valerie E. Caproni, presiding.

35. In *NATAS vs. MSDI* presiding judge Caproni remarked M.S.D.I. “*traffics in wild conspiracy theories*,” (id., 2021 WL 3271829, at *1 (S.D.N.Y. July 30, 2021)). Judge Caproni also observed at an October 25, 2021 show cause hearing for Goodman’s alleged contempt of court, “*this sounds like Q-Anon*”. Note: Goodman, using either M.S.D.I. or 21st Century 3D, prefers to use coded references such as “*the 17th letter of the alphabet*” on his social media conspiracy theory podcasts and not the actual term Q-Anon.

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Department of State
Division of Corporations

Entity Assumed Name History

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Entity Details

ENTITY NAME: MULTIMEDIA SYSTEM DESIGN, INC.	DOS ID: 1830828
FOREIGN LEGAL NAME:	FICTITIOUS NAME:
ENTITY TYPE: DOMESTIC BUSINESS CORPORATION	DURATION DATE/LATEST DATE OF DISSOLUTION:
SECTION OF LAW: 402 BCL - BUSINESS CORPORATION LAW	ENTITY STATUS: ACTIVE
DATE OF INITIAL DOS FILING: 06/21/1994	REASON FOR STATUS:
EFFECTIVE DATE INITIAL FILING: 06/21/1994	INACTIVE DATE:
FOREIGN FORMATION DATE:	STATEMENT STATUS: PAST DUE DATE
COUNTY: NEW YORK	NEXT STATEMENT DUE DATE: 06/30/1996
JURISDICTION: NEW YORK, UNITED STATES	NFP CATEGORY:

ENTITY DISPLAY NAME HISTORY FILING HISTORY MERGER HISTORY ASSUMED NAME HISTORY

Search

Filing Date	Assumed Name	Assumed Name ID	Status	Principal Location
10/10/2002	21ST CENTURY 3D	206900	Active	
05/15/1998	MULTIMEDIA SOFTWARE DESIGN	206899	Active	

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36. In various trade journals and New York City business directories, M.S.D.I. lists business addresses at 505 8th Avenue, New York, New York 10018 and 252 7th Avenue Apartment No. 6S, New York, NY 10001, and an address designated for service of process at 208 East 51st Street, Suite 200, New York, New York 10022. All of these addresses have been used by

process services attempting to serve Goodman with a summons for an active legal action in the M.I.E.D. Goodman continues to avoid service.

37. M.S.D.I. and/or 21st Century 3D (aka racketeering enterprise) are vicariously liable for the acts of their agent Goodman and Webb/Stranahan and possibly Ms. Stoughton. Counter Defendant Goodman is also personally liable for such acts of wire fraud and extortion.

38. **NON-PARTY GEORGE WEBB SWEIGERT.** Webb is a culpable co-conspirator with Goodman in the scheme to publish fake news and smear the undersigned and others. Webb joined the racketeering enterprise willing and continues to support it with his participation in sham legal actions (presumably under threat of blackmail and exposure by Goodman).

39. Webb is the former room-mate of Goodman. For at least the Spring and Summer of 2017 the pair were inseparable “YouTube stars”. Webb initiated defamation litigation in the M.I.E.D. for stories produced by the Cable News Network and C.B.S. 60 Minutes that featured Webb’s views on “patient zero” of the COVID-19 outbreak. (*See Webb v CNN* Case 2:20-cv-12933-GAD-KGA and M.I.E.D. 2:22-cv-10002-GAD-KGA *Sweigert v. Goodman*).

40. Webb has filed another lawsuit in Georgia to re-litigate the findings of the M.I.E.D. Court (see exhibits annex). That case has thankfully been recently dismissed in the Northern District of Georgia. Webb is a culpable co-conspirator with Goodman in the scheme to publish fake news and smear the undersigned. Webb understands that these fake lawsuits push false narratives for which he may broadcast content on social media.

41. Webb presently is using his deceitful tricks to tell his current followers on social media that he is now a “Christian”, just as Webb told the world that he was “Jewish” when he was creating videos with Goodman in the Spring and Summer of 2017. Webb is in fact anti-

Christian with a deep and profound hatred of things related to the Christian movement, as evidenced by the innumerable sexual partners he has publicly bragged had over the years.

42. Webb's sexual interests, like his relationship with Corean Elizabeth Stoughton, have not been lost on Goodman, who openly accuses the undersigned of participating in a wife swapping scheme with Webb. In fact, Goodman is fond of posting photos of the innocent third party on his hoax Twitter accounts, like the GHenryDickFace account, with accompany false and irreversible disgusting slander about sexual misconduct.

43. **NON-PARTY LEE STRANAHAN.** Lee Stranahan is a paid operative of the Russian news service "SPUTNIK" and a life long friend of Goodman. He was an unsuccessful defendant in a defamation lawsuit that orbited the white national march in Charlottesville, Virginia (8/17/2017) that led to the death of at least one protestor at the alt-right "Unite the Right rally". At the rally many marched with swastikas, chanting the Nazi call, "blood and soil," in reference to the notion that ethnicity and blood descent is determinative of entitlement to the land. It is instructive to note that Mr. Goodman recently announced to his social media audience that he believed Adolf Hitler deserved to have a Twitter and YouTube account if he were in power today. In that defamation action Alex Jones was Mr. Stranahan's co-defendant (<https://www.courtlistener.com/docket/6333356/gilmore-v-jones/>).

44. **COUNTER PLAINTIFF D. G. SWEIGERT.** At all times described herein, the Counter Plaintiff is a *pro se* non-attorney layman that has suffered Article III injuries and damages and seeks redress in the federal courts. Counter Plaintiff has suffered the dilution of his career in the emergency medical services and the emergency management field as a direct result of the activities of the Defendant. Counter Plaintiff is a private figure.

45. The Counter Plaintiff, an Honorable Discharged U.S. Air Force veteran, holds two masters degrees, is a licensed Emergency Medical Technician, a former member of the Livermore-Pleasanton Fire Department Community Emergency Response Team (LPCERT), a licensed ham radio operator, a 2018 graduate of Las Positas College (LPC) (with honors) with a degree in Network Security (attended LPC under a Veterans Educational Assistance Program), who became a Certified Ethical Hacker (U.S. Department of Defense cyber defense program (DoD 8570.01-Manual)) and is a California Emergency Management Specialist as certified by the Governor's Office of Emergency Services (CalOES). The Counter Plaintiff has self-published a dozen white papers on cyber security of critical infrastructure as well as the book "*Certified Ethical Hackers Field Operations Guide*". The Counter Plaintiff professional reputation and business opportunities in the field of cyber emergency response have all but been destroyed by Goodman's fraudulent transmission of his hoax news videos.

JURISDICTION

46. This is a diversity case with at least \$75,001.00 in damages due to the Article III damages suffered at the hands of the Counter Defendant's CSTT racketeering enterprise and the agent of the enterprise Goodman, to include damage to professional reputation, business disparagement, intentional infliction of emotional distress and other damages. Restated, Goodman acts in his personal capacity at times, and as Agent Goodman for the private virtual racketeering enterprise.

47. Additional jurisdiction is provided by: various racketeering laws under 18 U.S. Code § 1962(a)(b)(c) and (d), copyright infringement under 17 U.S.C. § 101 et seq. 17 U.S.C. § 1201(a) & (b) (Section 1201 of the Digital Millennium Copyright Act (DCMA)), violations of Lanham Act, 11 U.S.C. § 1125(a). Section 1125(a), violations of the Federal Trade Commission Act, 15

U.S.C. § 45(a), which prohibits “unfair or deceptive acts or practices in or affecting commerce” and ancillary state pendant claims such as defamation, invasion of privacy by false light, defamation *per se*, slander *per se*, libel *per se*, defamation by implication, international infliction of emotional distress (I.I.E.D.).

48. All three (Goodman, Webb, Stranahan) solicit donations on their websites or blogs, advertise their own products on their websites, blogs, or in their articles or videos, and/or derive revenue from advertisements that are placed on their websites and blogs, or within their articles or private club subscriber videos (Patreon, SubscribeStar, Odysee). The traffic to these websites and purchases or donations made on these websites, including by individuals in the States of New York and Michigan, leads directly or indirectly to the revenue received by the trio, but specifically to Goodman, 21st Century 3D and M.S.D.I. and indirectly to Stranahan and Webb.

49. Agent Goodman’s purposeful avilment of the resources in Michigan has been manifested by at least three (3) for profit business trips to benefit the racketeering enterprise in Detroit, Michigan. These trips were made by Agent Goodman to discharge his duties as a M.S.D.I. / 21st Century 3D racketeering enterprise agent to produce profit-centered content for the subscriber video service. M.S.D.I. and/or 21st Century 3D, aka the racketeering enterprise, are vicariously liable for the acts of Agent Goodman while in the State of Michigan.

50. Only three months ago, Goodman, while discharging his corporate responsibilities, committed the tort of defamation with actual malice (ironically Goodman cites the legal definition of defamation *per se* in the video) in the State of Michigan (Section 600.705) when he, using M.S.D.I. / 21st Century 3D resources, released the below cited video broadcast which reiterates the supposed criminal forgery misconduct of Richard Lory and the Counter Plaintiff.

51. After filing maliciously fictitious police reports, Goodman positions himself in front of the Detroit Police Department in the video to describe his meetings with police about Loury / Counter Plaintiff and their “criminal acts”.



Charles Ortel is CLOSING IN – Detroit Schlock City

Crowdsourcethe Truth 8 • 1.4K views • Streamed 3 months ago

America's Democrat led cities are crumbling, Charles joins me to discuss the latest crises. subscribe to Crowdsourcethe Truth on Rumble - <https://rumble.com/user/csthetruth> subscribe to Crowdsour...

<https://www.youtube.com/watch?v=HBi6JDsTfYg>



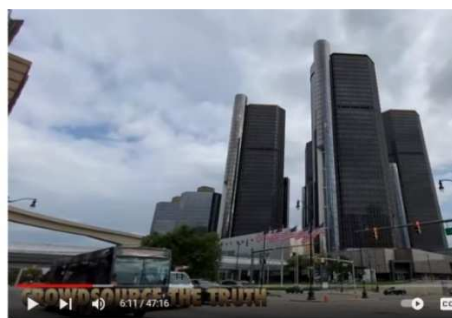
Charles Ortel is CLOSING IN – Detroit Schlock City

Crowdsourcethe Truth 8
2.75K subscribers

Subscribed

126

Share



Charles Ortel is CLOSING IN – Detroit Schlock City

Crowdsourcethe Truth 8
2.75K subscribers

Subscribed

126

Share



Charles Ortel is CLOSING IN – Detroit Schlock City

Crowdsourcethe Truth 8
2.75K subscribers

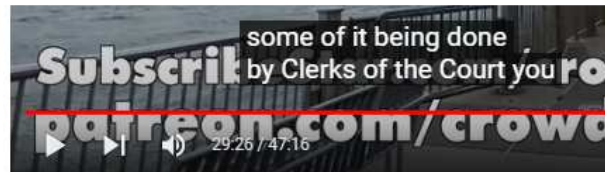
Subscribed

126

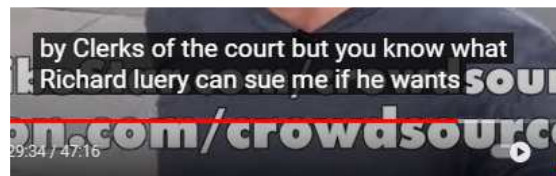
Share



Charles Ortel is CLOSING IN - Detroit Schlock City



Charles Ortel is CLOSING IN - Detroit Schlock City



Charles Ortel is CLOSING IN - Detroit Schlock City



Charles Ortel is CLOSING IN - Detroit Schlock City

<https://www.youtube.com/watch?v=HBi6JDsTfYg>

52. For similar antics in abusing New York Police Department (N.Y.P.D.) resources at the entrance of Twitter Headquarters in New York City on 11/1/2022, Goodman was issued a disorderly conduct citation (see below).

The court appearance location: ☐ Other (specify)

☐ Bronx Criminal Court ☐ Kings & New York Criminal Court ☒ Queens Criminal Court ☐ Richmond Criminal Court

ID License Number: 604 459411 State: NY Type: Class: D Expires (mm/dd/yy): 01/07/2026

Race: ☒ White ☐ Black ☐ Hispanic ☐ Asian/Pacific Is. Sex: M HT: 5 WT: 150 Eyes: GR Hair: BR Plate/Reg: 245 West 77th Street

Reg State: Expires (mm/dd/yy): Plate Type: Vch Type: Make: Year: Color:

The Person Described Above is Charged as Follows:

Title of Offense: DISCON-creates hazardous physically

Time: 7:30 (hr) Date of Offense (mm/dd/yy): 11/01/22 County: NY Precinct: 010

Place of Offense: 245 West 77th Street

In Violation of Section: 240.20a Subsection: VTS: ☐ Adjust Code: ☐ Penal Law: ☒ Park Rules: ☐ Other:

Factual Allegations (describe how the offense was committed, OR complete reversal): At 4:30 the undersigned is informed by someone known to the DEPT. that the defendant engaged in conduct that is illegal

23:00 / 51:59

GENERAL ALLEGATIONS

The Counter Defendants' CrowdSource The Truth CSTT Enterprise

53. Defendant reserves the right to raise additional and other affirmative defenses that may subsequently become or may appear upon information and belief to be applicable to the Counterclaims.

54. CrowdSource The Truth (aka Defendant's racketeering enterprise) is a for profit racketeering enterprise that is promoted as a "fact checking service" that is engaged in "conducting investigations" and gathering evidence for "criminal prosecutions". This "business" relies on many non-revenue producing social media sites such as Rumble, BitChute, YouTube to distribute general public relations and awareness for the profit producing sites known as Patreon, SubScribeStar and Odysee.

<https://www.subscribestar.com/crowdsourcethetruth> ,

<https://www.patreon.com/crowdsourcethetruth> ,

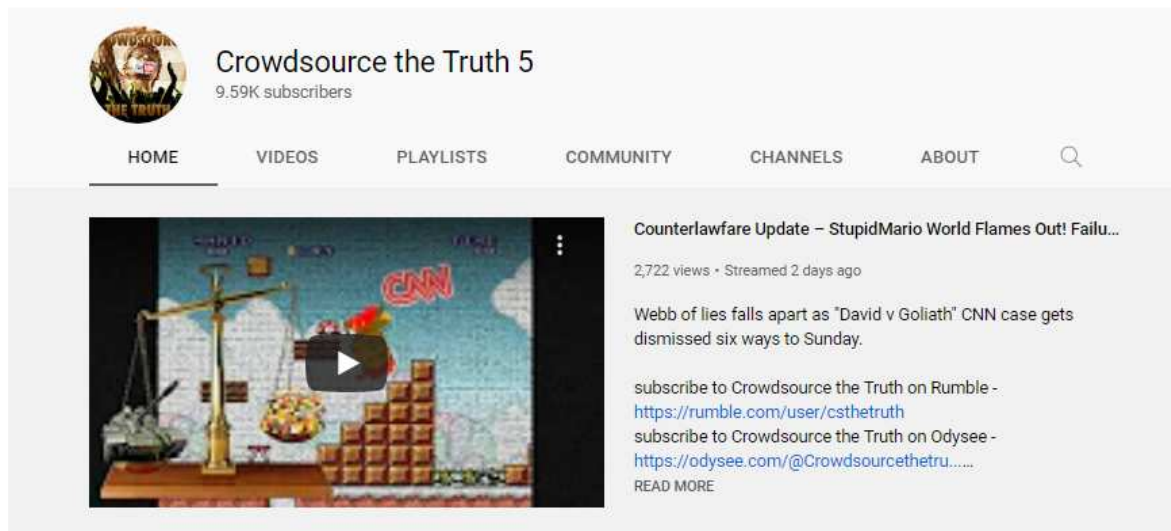
<https://odysee.com/@Crowdsourcethetruth:d?view=membership>

55. According to Goodman, the legal entities M.S.D.I. / 21st Century 3D provide a legal firewall that enjoys immunity from litigation under the Communications Decency Act, 47 U.S. Code § 230 (C.D.A.) (but, sometimes Goodman claims these entities are “dormant”). This legal stand is incorrect, as it is the social media platform providers (Rumble, YouTube, Patreon, etc.) that have access to immunity under C.D.A., not Goodman’s content pushed into the CSTT enterprise. Claims arising from decisions like Twitter’s decision to remove Goodman’s 21st Century 3D (@21C3D) account from the platform are immune from liability under § 230(c)(1).

56. Goodman routinely uses M.S.D.I. / 21st Century 3D to violate the terms of service of social media providers while discharging his duties as an agent for M.S.D.I. and 21st Century 3D which have led to the suspension and/or termination of several social media accounts controlled by M.S.D.I. and/or 21st Century 3D. To this end, Goodman maintains proxy accounts to work around account bans and terminations (aka ban evasion) on a myriad of electronic Internet servers, collectively known as the “CrowdSource The Truth CSTT” (aka the Defendants CSTT enterprise, the collective of inauthentic social media proxy accounts co-mingled with supposed “legitimate” accounts”). Caveat: Counter Plaintiff is aware that the Counter Defendant presently maintains four (4) Twitter accounts: <https://twitter.com/csthetruth> , <https://twitter.com/cheburashka1964> , <https://twitter.com/GHenryDickface> and <https://twitter.com/counterspoliat1> .

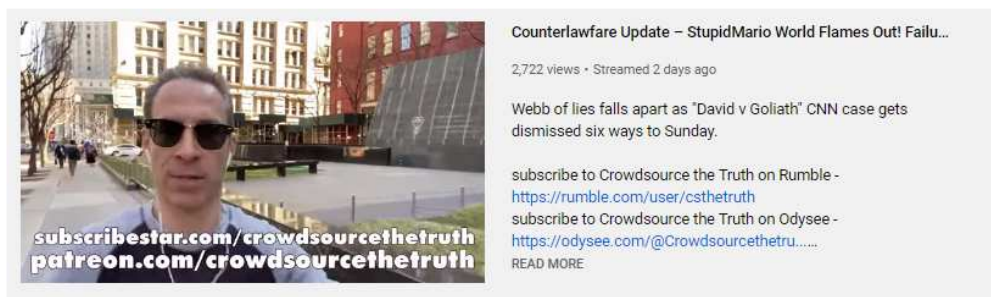
57. Meanwhile, Goodman uses a two staged approach to receive monies from unsuspecting Michigan and New York consumers. There is a (1) public component (13 social media properties accessible by the general public with no user authentication) and (2) the private

Internet component accessible after user authentication on a subscriber / membership basis. The public broadcasts (stage one) serve as an advertising (false advertising) and a promotional device (analogous to a book cover or book wrapper), while the for-profit subscriber content is private (stage two) (analogous to viewing the actual book content) after a recurring credit card payment schedule is established (e.g. \$10.00 a month). The private (stage two) video service allows Goodman to slander and defame his targets behind a so-called credit card “paywall”.



<https://www.youtube.com/channel/UC2lcaABsK-5OfFYb6P9nP3Q>

58. YOUTUBE.COM, RUMBLE.COM and other publicly accessible social media sites (stage one) are used by M.S.D.I., 21st Century 3D and/or Goodman to solicit (false advertising) memberships to credit card holders (stage two) with an enticement to obtain authenticated user accounts on PATREON, ODYSEE and SUBSCRIBESTAR (stage two) Internet sites.



<https://www.youtube.com/watch?v=qTuXPfOZERk>

Crowdsource the Truth 5

9.59K subscribers

SUBSCRIBE

Webb of lies falls apart as "David v Goliath" CNN case gets dismissed six ways to Sunday.

subscribe to Crowdsource the Truth on Rumble - <https://rumble.com/user/csthetruth>

subscribe to Crowdsource the Truth on Odysee - <https://odysee.com/@Crowdsourcethetruth...>

Please sponsor the Crowdsource the Truth Counterlawfare Fund at

<http://www.crowdsourcethetruth.com>.

Become a sponsor & enjoy exclusive content on SubscribeStar & Patreon

Get a FREE 3-Day trial at <http://www.subscribe.com/crowdsou...>

<http://www.patreon.com/crowdsourcethe...> <http://paypal.me/crowdsourcethetruth>

Visit <http://www.crowdsourcethetruth.com>

<https://www.youtube.com/watch?v=qTuXPFoZERk>

Unfair Trade Practices and Business Libel by the Counter Defendants' CSTT Enterprise

59. Whether they are public (stage one) announcements (false advertising) and private credit card (stage two) podcasts, Goodman, who with actual malice, spreads smears of criminal conduct, mental illness, accusations of grotesque behavior, etc. against the Counter Plaintiff (and others) that are materially false to generate interest in his broadcasts.

60. New York and Michigan consumers that watch these CSTT stage one enticements (false advertising) to subscribe, and who actually do subscribe with credit cards are being defrauded. These New York and Michigan consumers expect to review and watch a "fact checking service" that is fact based. Thus, when Goodman defames individuals like Loury, the Counter Plaintiff, and Jankowicz, the public assumes and expects that the allegations pushed by Goodman are true. They are not, but they do help coalesce cyber lynch mobs, or as Goodman

calls them his “Cyber Militia”. The transmission of these video files to the servers (such as Patreon, SubscribeStar and Odysee) represent predicate acts of wire fraud.

61. Commencing in July 2021 and continuously occurring to the present, Counter Defendant M.S.D.I. / 21st Century 3D’s Goodman, has maliciously published fact statements regarding a criminal conspiracy (defamation by implication) about the Counter Plaintiff.

62. According to Goodman both Sweigert brothers (aka SUPER MARIO brothers) and the federal employee Richard Loury should be prosecuted and sentenced to 14 years in prison under Michigan law (defamation *per se*). This is especially important as Michigan law, as codified in MCL 750.411a(1), makes it a crime to falsely report individuals to law enforcement agencies. The Counter Defendant enterprise’s agent Goodman knew these reports of criminal forgery to be false when reported the “SUPER MARIO BROTHERS” to the Detroit Police Department and F.B.I.

63. Below are recent examples (January 20230) of Goodman’s Twitter “tweets” via various Twitter accounts controlled by M.S.D.I. / 21st Century 3D.



<https://twitter.com/GHenryDickface/status/1588618185498296320>



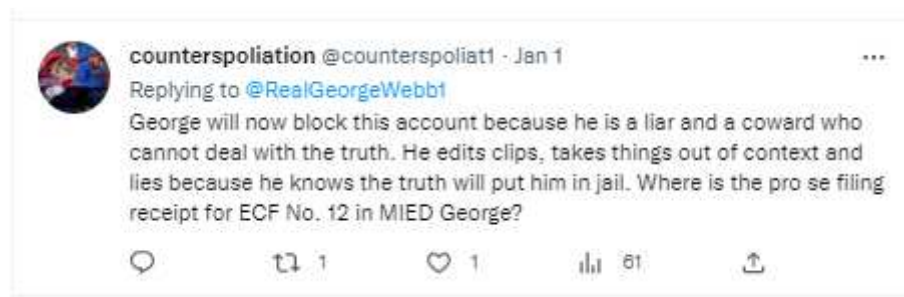
<https://twitter.com/GHenryDickface/status/1588618544660742144>



<https://twitter.com/counterspoliat1/status/1609706501727465474>



<https://twitter.com/counterspoliat1/status/1609704685375737856>



<https://twitter.com/counterspoliat1/status/1609704392512372737>

64. Goodman has stated in a dozen videos that he is “protecting” the CrowdSource The Truth enterprise with the COUNTER LAWFARE REPORT. Thus, Goodman, acting as an agent for the CSTT enterprise, makes false police reports and associated defamatory statements as part of discharging his duties as a corporate agent for the CSTT racketeering enterprise.

Webb is a willing agent in the enterprise and stages phony and hoax conflict with Goodman to create the illusion of an on-going feud to triangulate new victims (in this case Chris Bouzy and his attorneys, Adam Sharp and his attorneys, etc.).

65. Goodman, as an agent of the CSTT enterprise and in his personal capacity, has been engaging in unfair trade practices and illegal consumer practices which have resulted in injuries and damages to the Counter Plaintiff in excess of \$75,001.00. Such damages have been caused, in part, by Goodman's filing of maliciously fictitious police reports with the Detroit Police Department and F.B.I. about Lory and the Counter Plaintiff.

66. As the Counter Plaintiff owns certain invaluable intellectual property rights, including all rights of publicity associated with the Counter Plaintiff's education, career reputation and professional persona. The Counter Plaintiff has published numerous white papers, articles and treatises on ethical hacking, network security, emergency management, protection of critical infrastructure, etc.

67. To this end, prior to the Counter Defendant's reckless attacks on Counter Plaintiff's professional reputation, the Counter Plaintiff enjoyed a professional reputation on the Internet as a Certified Ethical Hacker and technical publisher. The Counter Plaintiff's name, photograph and likeness have tremendous value, in particular to the industries associated with cyber security infrastructure protection aka "network security" and "ethical hacking", etc.

68. The Counter Defendant Goodman acting as an agent for M.S.D.I. / 21st Century 3D (CSTT enterprise) and in his personal capacity has maliciously published materially false statements with malice concerning the professional competency and abilities of the Plaintiff who is a Certified Ethical Hacker. Goodman, acting as an authorized agent, has published a dozen social media videos accusing the Plaintiff of criminal participation in a conspiracy with

Webb and Loury to docket forged legal documents in the M.I.E.D. Court. Goodman works with Webb to set-up and stage the litigation, then Goodman violates the federal wire fraud statutes to transmit fraudulent documents to the court in question (M.I.E.D.).

69. According to Goodman, Counter Plaintiff's document known as the *Certified Ethical Hackers Field Operations Manual* provides a blueprint for created illegal forged documents using Adobe Acrobat .PDF files. Such statements published by the Defendant CSTT enterprise Agent Goodman (acting in his official and personal capacities) were made with actual malice and are of no legitimate interest to the public, rather they are part of an on-going smear campaign developed by disinformation professionals. These unprivileged statements made with actual malice of Counter Plaintiff's supposed criminal conduct have resulted in special harm to the Plaintiff's business, technical and professional reputation. Further, each and every time Goodman has a technical glitch with his social media podcast equipment, he is quick to implicate "that ethical hacker".



https://twitter.com/JGoodman_CSTT/status/1504943754221965317?ext=HHwWisC-1d6X0eIpAAAA

70. The Counter Plaintiff likeness, name, image and persona (violation of right to privacy) have been used as part of a long-term false advertising campaign since at least one year ago by a so-called "fact checking service" provided by CSTT to lure and entice New York and Michigan consumers to the Counter Defendant's "pay-wall" videos available at PATREON, ODYSSEY and SUBSCRIBESTAR.

71. Counter Defendant M.S.D.I. / 21st Century 3D / Agent Goodman and/or Goodman personally, have acted in an extreme and outrageous manner with actual malice to accuse the Counter Plaintiff of criminal conduct under a false advertising campaign relying on wire fraud resulting in professional disparagement.

72. The Counter Defendants CSTT enterprise (M.S.D.I. / 21st Century 3D) using Goodman's agency have, in the preceding twelve (12) months, acted with actual malice and added a slander against the Counter Plaintiff of criminal conduct related to the publishing of a PDF court document in the M.I.E.D. action *George Webb Sweigert v. Cable News Network* (-2:20-cv-12933-GAD-KGA).

73. The Counter Defendant (M.S.D.I. / 21st Century 3D) Goodman filed an Amicus Brief in the M.I.E.D. Court (2:20-cv-12933-GAD-KGA, *Sweigert v. CNN*, **docket 20**) which alleged fraud upon the court perpetrated Richard Loury and Sweigert. Counter Defendant Goodman using the CSTT enterprise then used Goodman's agency to file the Amicus brief as a fraudulent cornerstone to build a massive criminal conspiracy social media narrative that has been disseminated in dozens of video productions (defamation by implication) with actual malice.



https://twitter.com/JGoodman_CSTT/status/1504954872273285126?ext=HHwWjMC9zfKeluIpAAAA

74. In the two-page brief, titled BRIEF OF AMICUS CURIAE JASON GOODMAN IN SUPPORT OF DEFENDANT’S MOTION TO DISMISS, Counter Defendant Goodman explains that he “is a pro se non-attorney, non-party to this case,” then Goodman declares that he “comes now as a friend of the court to share facts and evidence Goodman alleges reveal a fraud on the court intended to affect the outcome of this case.” *Sweigert v. CNN*, Case 2:20-cv-12933-GAD-KGA ECF No. 20, PageID.244 Filed 07/20/21 Page 2 of 4.

75. Concurrently with the filing of the Amicus brief, the Counter Defendant Goodman published a public podcast with his then attorney John H. Snyder, New York City, describing corruption in the M.I.E.D.; *The Counter Lawfare Report with Attorney John Snyder – Allegations of Corruption in Federal Court*, June 30, 2021.



<https://www.youtube.com/watch?v=MVzocok1fy8>

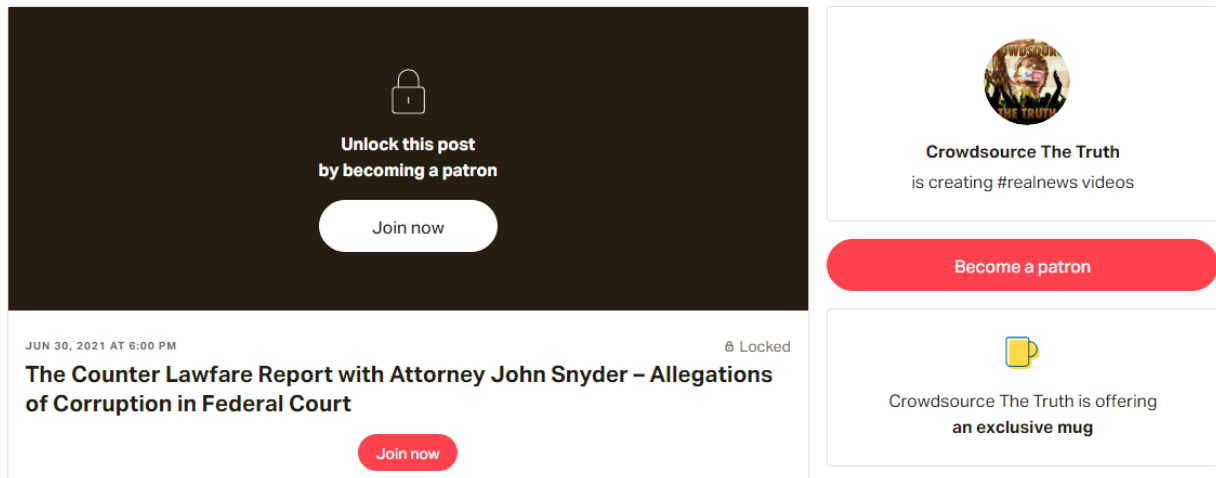
Crowdsource the Truth 5

8.95K subscribers

SUBSCRIBE

The Counter Lawfare Report returns to Crowdsource the Truth with a new legal expert. Harvard JD, tech entrepreneur and legal expert Jonathan Snyder joins me to explore allegations of corruption within the Federal Court system. This is going to be an explosive episode. Join us on SubscribeStar and Patreon.

76. Below is a representation of the privatized version of the podcast content.



<https://www.patreon.com/posts/counter-lawfare-53141470>

77. At the 10:12 time mark (from the above public video) the Defendant provides a teaser for the PATREON/SUBSCRIBESTAR privatized videos.

Jason Goodman (10:12). Before we begin our deep dive into this stunning evidence that – I want to remind our audience this isn't proof of fraud or corruption within the federal court – but were gonna show some shocking evidence that I believe is evidence of fraud and we're going to allow the audience to make their own decision. We are going to be starting in just under five minutes at subscribestar.com slash crowdsource the truth and patreon.com slash crowdsource the truth.



78. The YOUTUBE.COM video podcast described above is, in fact, an advertisement device to lure New York and Michigan consumers to the privatized videos on

PATREON/SUBSCRIBESTAR/ODYSEE. The public video (see above) is a tease and lure which implies criminal activity will be examined.

79. This lure and tease tactic is common amongst QAnon-based conspiracy theorists, such as Goodman (whom a federal judge (Caproni) has ruled “*traffics in wild conspiracy theories*”). The term “QAnon-based conspiracy theories” is, in the Counter Plaintiff’s view, the most succinct way of contextualizing CrowdSource The Truth broadcasts and the baseless “investigations” that promote materially false statements.

80. On December 30, 2021 the Counter Defendant’s enterprise (M.S.D.I. / 21st Century 3D) maliciously published a public video podcast, entitled, *Ghost Town NYC – Hollywood Distorter's False Statements of Fact Favor EMMY Liars & Goodbye de Blasio*, (https://www.youtube.com/watch?v=90_Jtqt-JtE) , where he stated on camera:

*Jason Goodman (1:10:52) “If it wasn’t for that pesky amicus brief, because you see, that presented evidence that supports the allegation that a forged document was placed on the docket, and it raises certain questions about who might have done that. And I have a feeling, I don’t know, and we won’t know until the hearing happens, but I have a feeling, **Judge Drain called that hearing because he wants to hear details about the evidence that I presented.**” [emphasis added]*

“And the court does have the inherent power to conduct an investigation in the case that someone’s trying to deceive them. Fraud on the court is within their power to investigate and punish people; for they got marshals there, they can arrest people, stick them in jail, and stuff, so we’ll see what happens.”



https://www.youtube.com/watch?v=90_Jtqt-JtE

81. Videos distributed via social media by the Counter Defendant's CSTT enterprise assert that "investigations" are conducted as a COUNTER LAWFARE initiative to **protect** the CSTT from "Deep State" operatives using the legal system to quench "journalist endeavors".

COUNTER LAWFARE is another hoax and scam that is maliciously published with the intent to defraud the public in reckless disregard of the truth for deceptive purposes (see

"Crowdsourc The Truth is an Open Source Fact Checking "Truth Engine" at

<https://www.patreon.com/crowdsourcethetruth>).

82. The intentional and fraudulent misrepresentations by Counter Defendant's M.S.D.I. / 21st Century 3D racketeering enterprise, with Goodman at the helm, include "investigations" into the background of individuals, like Richard Louri, to "expose" "Deep State" affiliations, and that such private "facts" are then vetted by the "crowd" for substantiation and used to claim law enforcement arrests are forthcoming after Goodman files maliciously fictitious police reports (see Detroit Police Department and Detroit F.B.I. field office meetings).

83. In violation of Michigan's MCL 750.411a(1), Agent Goodman makes false reports to law enforcement about the "crime", which are then featured in the broadcasts sponsored by the

Counter Defendant's CSTT enterprise (at both stage one and stage two outlets). Goodman's objective is to "defend the CSTT enterprise" by causing injury the target's (Loury and Counter Plaintiff) personal reputation, business reputation, emotions, status in the community, and other such special damages associated with trade / business libel, defamation *per se* and defamation *per quod*.

SPECIFIC ALLEGATIONS

84. The CrowdSource The Truth enterprise (21st Century 3D / M.S.D.I. with Goodman at the helm) smears human targets for reputation destruction under the guise of conducting hoax "investigations", like the accusations of a criminal forgery conspiracy within the M.I.E.D., as alleged in numerous podcasts to the public, which state that Richard Loury, the Counter Plaintiff and his brother Webb have participated in some sort of criminal forgery and fraud upon the court and face "criminal charges" (false light), see January 29, 2022, Crowdsorce the Truth livestream titled, Ghost Town NYC-Bomb Cyclone Edition Blizzard '22. As Goodman stated in the video:

Jason Goodman: (51:52) It's amazing the number of people who are in the professional harassment business. It's so bad the Super Mario brothers (a reference to the Sweigert brothers), I can't believe I haven't spoken about them. There's been a lot of stuff going on with them. They seem to be concerned about Detroit. Did people catch my discussion about traveling to Detroit? It was a big pain in the ass. The hearing got cancelled...hearing got cancelled and I think I, I think I know why, I don't want to say too much about it because these are ongoing things, but Super Mario brothers should be very concerned about Detroit."

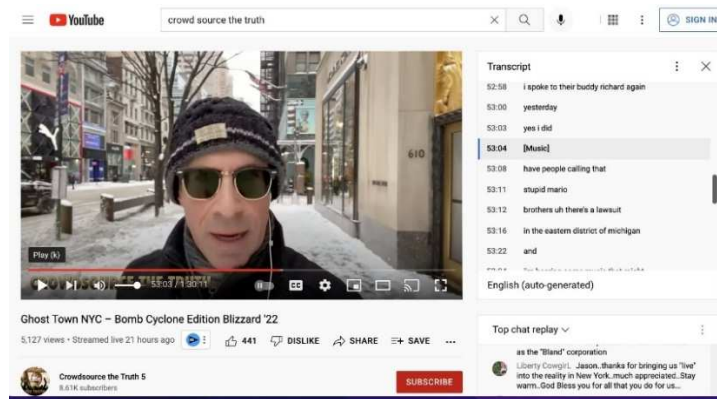
(52:58) "I spoke to their buddy Richard again yesterday. Yes I did...have people calling that stupid Mario brothers. Uh there's a lawsuit in the Eastern District of Michigan, but there was another filing in the suit yesterday and Richard Loury (of the

Michigan Eastern District court staff) left his name on it. This guy's not too smart and they're going to be in a lot of trouble. I don't think they fully appreciate what's going on."

(54:46) "If anybody had any questions If Mr. Loury were or were not guilty, I called him up, he answered the phone. I said Richard are you all right? Your voice sounds a little rough. And he said who's this? I said, it's Jason. He said I'm okay. I said you've been with George, what's going on with that? Click. Hung up the phone. I don't know personally, is that the way an innocent guy would act?"

(55:53) "I think when we finally get to speak with Judge Drain in the Eastern District of Michigan, it hit with a barrel."

85. The false light implication is that Richard Loury and the Counter Plaintiff are working in a clandestine and covert manner, relying on the blue print in the *Certified Ethical Hacker's Field Operations Guide*, to corrupt the processes of the M.I.E.D. with forged court documents. The video screenshots appear below (<https://www.youtube.com/watch?v=7LlPmHUz7Qs>).



86. In a “Crowdsourcethe Truth” Twitter tweet of Feb. 13, 2022, the Counter Plaintiff is identified as part of the “SUPER MARIO BROTHER”. This is an example of “talk around” for the advertisement of privatized video content where actual names of individuals are masked to

the public (stage one - false advertising), but then revealed on PATREON / SUBSCRIBESTAR / ODYSEE paywall video content.



87. On January 18, 2022 the Counter Defendant's CSTT enterprise sole owner traveled to Detroit, Michigan with the intent to attend a hearing in *Sweigert v. CNN*. As claimed by Agent Goodman in a dozen videos published since that time, while in Detroit the Agent Goodman met with a federal law enforcement special agent and the Detroit Police Department to provide false police reports about Louri/Sweigert criminal conspiracy (defamation by implication), aka SUPER MARIO brothers. Below is a public video podcast the Defendant made while in Detroit.



https://www.youtube.com/watch?v=SSinKt_0PZE

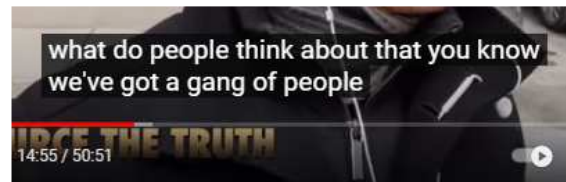
88. On Jan. 28, 2022 Goodman, acting as an agent for the Counter Defendant's CSTT enterprise, maliciously published a Twitter tweet after hanging up the telephone with Richard Loury.



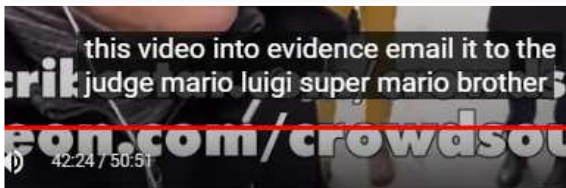
89. The above tweet makes reference to a CSTT enterprise social media podcast known as the "COUNTER LAWFARE REPORT". The hoax investigations (as depicted above) are designed to promote anti-social behavior, such as cyber mob attacks, glamorization of doxing, and incitement to violence as seen with the insurrection at the U.S. Capitol on January 6, 2021.



<https://www.youtube.com/watch?v=VQAFqyoliBA>

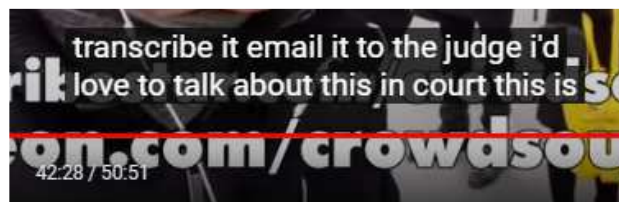


Lawfare Rages On in the Streets of New York

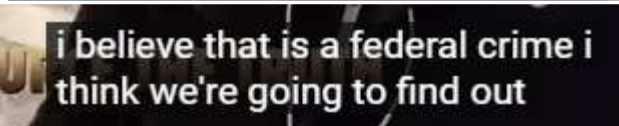
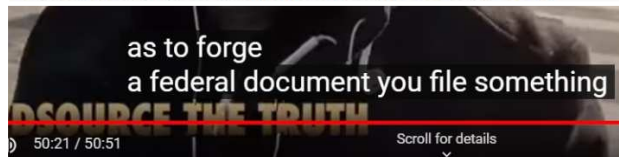


Lawfare Rages On in the Streets of New York

Above: Example of Mr. Goodman's references to Plaintiff, "Mario Luigi, Super Mario Brother"



Lawfare Rages On in the Streets of New York



FIRST CAUSE OF ACTION

Misappropriation of Right of Publicity Against Counter Defendant

90. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 89, inclusive, as if fully restated herein.

91. The conduct the enterprise (21st Century 3D / M.S.D.I.) via Agent Goodman, as alleged hereinabove, under the CrowdSource The Truth trademark, constitutes a knowing and unauthorized use of the Counter Plaintiff's name, likeness, photograph and name for commercial purposes, which have substantial commercial value. Counter Defendant's CSTT enterprise used Counter Plaintiff's name, photograph, and likeness knowingly and deliberately, without the prior consent of any of the Counter Plaintiff. Counter Plaintiff has suffered actual damages as a result of Counter Defendant's CSTT enterprise deliberate use of his names, photograph, and likeness on advertisements and other types of solicitations for goods or services (e.g. promotion of PATREON subscriptions). Counter Defendant's CSTT enterprise engaged in outrageous conduct, carried on with willful and conscious disregard of the rights of Counter Plaintiff. Each such use was unequivocally and directly for purposes of advertising or selling or soliciting purchases of subscription services by Goodman / M.S.D.I. / 21st Century 3D such that prior consent was required.

92. As set forth more fully above, Counter Defendant's CSTT enterprise is based around harassment campaigns against the Counter Plaintiff and other like situated individuals (Loury / Jankowicz) and creating content around the use of Counter Plaintiff's name, photograph, picture, portrait and/or likeness, to solicit patronage by their fans. Counter Defendant's CSTT enterprise most lucrative use of Counter Plaintiffs' name, photograph, picture, portrait and/or likeness, appears to be through Counter Defendant's CSTT enterprise podcast, on PATREON, wherein Counter Defendant solicits fees from their "patrons" or fans, to access their podcasts,

which are principally based on using Counter Plaintiffs' name, photographs, pictures, portraits and/or likenesses, as punching bags, and the basis of their shows, and the content therein.

93. Counter Defendant's CSTT enterprise used Counter Plaintiff's name, photograph, picture, portrait and/or likeness in numerous ways, to advertise, solicit, and promote their business to tens of thousands of listeners, fans, and consumers; and on a variety of formats, and popular digital platforms, including, but not limited to: PATREON, Facebook, YouTube, Twitter, Periscope, Bit-Chute, SubscribeStar, and countless others.

94. In sum, this is considered "click-bait", or the use of a persona's persona to attract viewers to "click" on the podcast advertisement thumbnail (displayed in Google, LLC and YouTube, LLC search results). The Counter Plaintiff had no relationship to these advertisements in disguise that proclaim viewers should become "patrons" via the PATREON.com, ODYSEE.com and/or SubscribeStar.com "pay-walls", or metered video content that requires pre-payment via credit card by subscribers.

95. Counter Defendant's CSTT enterprise operating at the direction of Goodman, under the CrowdSource The Truth trademark, have made purely profit driven commercial video content, transmitted over the Internet wires, with the Counter Plaintiff's likeness available on the PATREON, Odysee and SubscribeStar podcast subscription credit card "pay for view" website. Such commercial content that attempts to establish a non-existent relationship with the Counter Plaintiff does not qualify for the newsworthy privilege exemption.

96. All of these tortious video productions are displayed for view to the general public using an Internet browser to access video podcast content via Internet networked servers that are maintained on-line by entities that operate public social media platforms in the jurisdiction of this Court (e.g. Google, LLC, YouTube, LLC, PATREON, INC, etc.).

97. The foregoing described conduct demonstrates the manner in which the Defendant has violated the privacy of the Counter Plaintiff.

SECOND CAUSE OF ACTION

Public Disclosure of Private Facts – against Counter Defendant

Violations of Right to Privacy and False Light against Counter Defendant

98. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 98, inclusive, as if fully restated herein.

99. Counter Defendant's CSTT enterprise, as directed by Agent Goodman, used Counter Plaintiff's name, photograph, picture, portrait and/or likeness, without his written consent, within the state of Michigan and New York, for purposes of advertising or trade. Counter Defendant's CSTT enterprise use of Counter Plaintiff's name, photograph, picture, portrait and/or likeness, was a use in, or as part of, an advertisement or solicitation for patronage.

100. Counter Defendant's CSTT enterprise (each of them) published with malice, over the Interstate wires, and republished Counter Plaintiff's name, photograph and/or likeness in multiple formats, including their own promotions and advertisements, websites, social media platforms.

101. Counter Defendant's CSTT enterprise (each of them) use of Counter Plaintiff's name, photograph, image and/or likeness (violation of privacy and false light) – on countless occasions and in numerous formats - is clearly a recognizable likeness of the Counter Plaintiff and is readily identifiable by someone familiar with him.

102. This tort can be described as, "One who gives publicity to a matter concerning the private life of another is subject to liability to the other for invasion of his privacy, if the matter publicized is of a kind that (a) would be highly offensive to a reasonable person, and (b) is not of legitimate concern to the public." (Rest.2d Torts, § 652D.)

103. Counter Plaintiff claims that Counter Defendant's CSTT enterprise (each of them) violated Counter Plaintiff's right to privacy by his tortious conduct by the publicized private information concerning the Counter Plaintiff, (false light) that a reasonable person in Counter Plaintiff's position would consider the publicity highly offensive.

104. That Counter Defendant's CSTT enterprise (each of them) acting via their Agent Goodman knew, or acted with reckless disregard of the fact, that a reasonable person in Counter Plaintiff's position would consider the publicity highly offensive, that the private information was not of legitimate public concern (or did not have a substantial connection to a matter of legitimate public concern).

105. That the Counter Plaintiff was harmed, and that the Counter Defendant's CSTT enterprise actions via Agent Goodman's conduct, acting with actual malice, was a substantial factor in causing Counter Plaintiff's harm.

106. The Counter Defendant's CSTT enterprise (each of them) acting in the scope of its authority, released private information about the Counter Plaintiff that was made public by either communicating said information via social media accounts controlled by the Agent Goodman of the Counter Defendant's CSTT enterprise.

107. Such social media accounts to include Twitter, YouTube, PATREON, SubscribeStar, Vimeo, Banned.Video, Facebook, BitChute, Periscope, etc. These social media services were used to obtain commercial value by the morbid and sensational prying into private life of the Counter Plaintiff for the sake of financial reward.

THIRD CAUSE OF ACTION

Intentional Infliction of Emotional Distress -- Against Counter Defendant

108. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 107, inclusive, as if fully restated herein.

109. Counter Plaintiff claims that Counter Defendant's CSTT enterprise (each of them) conduct caused him to suffer severe emotional distress due to the recruitment of "gang stalkers" (sufferers in the search for validation from their peers who desire to replace their unnerving emotion of diffuse fear with a determined and righteous anger) for the purposes of attacking the Counter Plaintiff on social media outlets. That the conduct of the Counter Defendant's CSTT enterprise (each of them) were in reckless disregard to the probability that Counter Plaintiff would suffer emotional distress, and that the Counter Defendant's CSTT enterprise (each of them) intended to cause emotional; distress with his outrageous conduct which was a substantial factor in causing Counter Plaintiff's severe emotional distress.

110. The Counter Defendant's CSTT enterprise (each of them) knew accusations of criminal conduct and fraud upon the court would have a detrimental impact on the Counter Plaintiff's technical business career as a Certified Ethical Hacker, which would cause the Counter Plaintiff to endure angst, anxiety, sleep disturbances and concern over future career opportunities, and published such materials with actual malice.

FOURTH CAUSE OF ACTION

Common Law Tort of Trade Libel – Against Counter Defendants

111. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 110, inclusive, as if fully restated herein.

112. Counter Plaintiff claims that Counter Defendant's CSTT enterprise (each of them) via Agent Goodman, acting in his respective personal and business capacities, harmed Counter Plaintiff by making a statement that disparaged Counter Plaintiff's cyber security and critical

infrastructure protection skills. The Counter Defendant's CSTT enterprise (each of them) published statements in a widely disseminated manner across a dozen social media properties that disparaged the ethics, skills, competence and quality of Counter Plaintiff's cyber security and infrastructure protection services. These insinuations, disparagements and slurs were known to the Counter Defendant's CSTT enterprise to be false, but the Counter Defendant's CSTT enterprise (each of them) arranged for publication to tens of thousands of viewers, nevertheless, with actual malice.

113. That Counter Defendant's CSTT enterprise (each of them) knew that these statements and insinuations were untrue; but, acted with reckless disregard of the truth or falsity of these statement, which called out the Counter Plaintiff by his name and likeness, photograph and/or persona which would cause employers and customers in the cyber defense industry to recognize the Counter Plaintiff.

114. That the Counter Defendant's companies (CSTT enterprise), under the control Agent Goodman, acting in his personal and business capacities, knew or should have recognized that someone else might act in reliance on the statement, causing Counter Plaintiff financial loss; and that the Counter Plaintiff suffered direct financial harm because someone else acted in reliance on the statements; and that Counter Defendant's CSTT enterprise conduct was a substantial factor in causing Counter Plaintiff's harm.

115. That such statements were made in video content that appeared on the services YouTube.com, SubscribeStar.com, Odysee.com and PATREON.com and are false advertising creations of the Counter Defendant's CSTT enterprise facilitated by Agent Goodman acting in his personal and business capacities.

FIFTH CAUSE OF ACTION

False Advertising – Against Counter Defendant

Violations of Lanham Act, 11 U.S.C. § 1125(a). Section 1125(a)

116. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 115, inclusive, as if fully restated herein.

117. That the Counter Defendant's CSTT enterprise (each of them) engaged in the deceptive and false advertising concerning video podcasts available under CrowdSource The Truth brand, which are nothing more than hoax journalism and are not to be considered – in any way – to be truthful. This commercial speech, advertising in disguise, is designed to lure the general public to the PATREON, ODYSEE and/or the SUBSCRIBESTAR page via the use of false, deceptive and misleading advertising. These false misrepresentations are designed to deceive the public at large in New York and Michigan, as a reasonable consumer would assume that fact-checking and vetting is taking place as advertised. In the mind of a reasonable New York and Michigan consumer CrowdSource The Truth is a fact checking truth engine that relies on the crowd to vet facts.

118. The "ABOUT US" definitions of CrowdSource The Truth that appears at <https://www.patreon.com/crowdsourcethetruth> are misleading, deceptive and designed to lure uniformed consumers; quoting in relevant part:

About Crowdsourc The Truth
Crowdsourc The Truth is an Open Source Fact Checking "Truth Engine" and political social media movement. We gather and disseminate raw intelligence and present it to our constantly expanding network of human brains for vetting, analysis and assessment. Crowdsourc the Truth focuses on examining current events, public policy, history, truth in media and other topics of interest. Members work together to collect and analyze data from around the web and around the world. Together, we will do our best to determine what is fact and what is fiction. Everyone is invited to participate but of course no one is required to. If you see something you disagree with, challenge it with stronger evidence and logic or simply tune it out. This group

is an Autocratic Democracy, to borrow some Orwellian doublespeak from those I wish to examine. I run it, but of course if the group dislikes my decisions the project will fail. All decisions will be subjected to group consensus. If anyone doesn't like the direction, please suggest a change or feel free to bow out."

119. The foregoing statement is entirely false and designed to deceptively entice members of the consuming public in New York and Michigan to provide credit card donations (as "patrons") to the Counter Defendant's companies (CSTT enterprise) and Agent Goodman.

There is no fact checking, issues are not vetted by the community, there is no examination of "evidence", etc. The attestation is false and designed to mislead the consuming public.

120. The Counter Defendant's CSTT enterprise (each of them) acted in his personal and professional capacities to publish claims they knew to be false, such claims as to a "Truth Engine" were false.

121. Every CrowdSource The Truth video podcast placed on publicly available social media (YouTube, Twitter, FaceBook, Periscope, Bit-Chute, etc.) contains a solicitation to join the credit card driven PATREON, ODYSEE or SUBSCRIBESTAR fan page. These solicitations are widely disseminated worldwide and to consumers in New York and Michigan. These social media footprints act as advertisement devices, or advertising in disguise. These "teaser" public podcasts entice, lure, and direct the consuming public to become "patrons" on the PATREON fan page. (<https://www.patreon.com/crowdsourcethetruth>)

122. The Counter Plaintiff has suffered financial hardship as a result of the commercial trade libel and commercial disparagement via the use of the Counter Defendant's CSTT enterprise false advertising, which insinuates the Counter Plaintiff is unfit to perform his professional

duties as a Certified Ethical Hacker and is engaged in a criminal conspiracy with Richard Lory.

123. These advertisement messages, transported over the Interstate wires, are untrue or misleading, which is known to the Counter Defendant's CSTT enterprise, or which by the exercise of reasonable care would have been known, to be untrue or misleading, which were disseminated as part of a plan or scheme with the intent not to provide truthful representations, truthful stories, truthful "crowdsourcing", etc. The Counter Defendant's CSTT enterprise proceeded in reckless disregard of the truth to publish false and misleading information to the consuming public in New York and Michigan.

124. That the foregoing allegations violate the Lanham Act at 11 U.S.C. § 1125(a). Section 1125(a) which creates two distinct bases for liability: false association, and false advertising. The Counter Plaintiff alleges the Counter Defendant and his CSTT enterprise violated both Lanham Act provisions.

SIXTH CAUSE OF ACTION

Violations of the Federal Trade Commission Act, 15 U.S.C. § 45(a) by Counter Defendant

125. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 124, inclusive, as if fully restated herein.

126. Counter Defendant's M.S.D.I. and 21st Century 3D social media properties (CSTT enterprise) practices as described above constitute deceptive acts or practices in violation of Section 5 of the Federal Trade Commission (FTC) Act, 15 U.S.C. § 45(a). Michigan and New York consumers have suffered, and will continue to suffer, substantial injury as a result of Counter Defendant and his CSTT enterprise violations of the FTC Act. In addition, Counter Defendant and his CSTT enterprise has been unjustly enriched as a result of these unlawful acts

or practices. Absent injunctive relief by this Court, Counter Defendant and his CSTT enterprise will likely to continue to injure consumers, reap unjust enrichment, and harm the public interest.

127. Acts or practices of the Counter Defendant and his CSTT enterprise are unfair under Section 5 of the FTC Act as they cause or are likely to cause substantial injury to consumers that consumers cannot reasonably avoid themselves and that is not outweighed by countervailing benefits to consumers or competition. 15 U.S.C. § 45(n). The Counter Defendant's companies (legal fictions) and the CSTT enterprise utilized their Agent Goodman, acting in a professional and business capacity, to facilitate these actions.

128. The CrowdSource The Truth CSTT enterprise acts and/or practices in processing fraudulent and unauthorized transactions to consumers' credit card accounts with the intent to defraud, as described in foregoing paragraphs above, have caused or are likely to cause substantial injury to consumers that is not reasonably avoidable by consumers themselves and that is not outweighed by countervailing benefits to consumers or competition. Such injury is the predictable result of the acts or practices described in the paragraphs above.

129. Therefore, the CrowdSource The Truth CSTT enterprise s acts or practices, as described above, constitute unfair acts or practices in violation of Section 5(a) of the FTC Act, 15 U.S.C. §§ 45(a) and 45(n).

SEVENTH CAUSE OF ACTION

Defamation by Implication – Against Defendants CSTT Enterprise

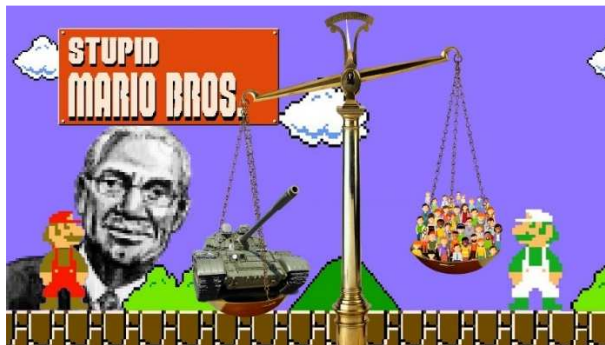
130. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 129, inclusive, as if fully restated herein.

131. That the CrowdSource The Truth CSTT enterprise was used to publish statements and cause statements to be published that are materially false concerning any cooperation on the part

of the Counter Plaintiff to assist, participate or collaborate in any scheme to docket forged documents in this Court.

132. The CrowdSource The Truth CSTT enterprise's use of "the Sweigert brothers" and the "Super Mario Brothers" in an opened and continuous podcast series indicates the portrayal that somehow the Counter Plaintiff is cooperating with his estranged brother ("Webb"), which the CrowdSource The Truth CSTT enterprise agents like Goodman know to be false, and have proceeded in reckless disregard to the truth to state otherwise.

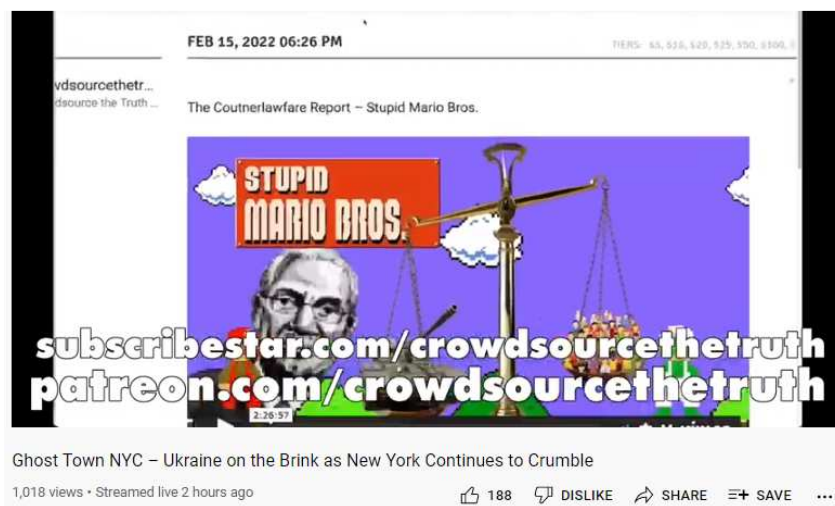
133. That the CrowdSource The Truth CSTT enterprise places content on PATREON, ODYSEE and SUBSCRIBESTAR under the banner of the COUNTER LAWFARE REPORT which implicates the "Super Mario Brothers" and Richard Loury in a criminal conspiracy. See below:





<https://twitter.com/csthetruth/status/1493779009854967808>

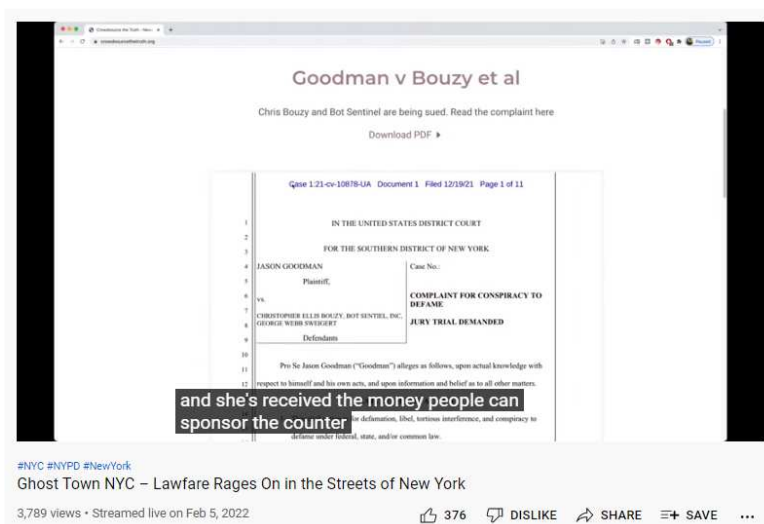
134. The above Twitter tweet published by the CrowdSource The Truth CSTT enterprise promotes the COUNTER LAWFARE REPORT on privatized pay-wall credit card channels, as does the YouTube video, shown below, which promotes the same program (featured cartoon of the presiding judge in the M.I.E.D.); entitled, *Ghost Town NYC – Ukraine on the Brink as New York Continues to Crumble*, published Feb. 21, 2022.



<https://www.youtube.com/watch?v=XXIW9QXb3r8>

135. This privatized program (see above) that is advertised on the public video *Ghost Town NYC – Ukraine on the Brink as New York Continues to Crumble* features content concerning the criminal conspiracy by the “Stupid Mario Brothers”. This implicates the Counter Plaintiff in a confabulation with “GEORGE WEBB” concerning a crime, according to the Counter Defendant on his CSTT enterprise publications, and implicates the Counter Plaintiff in such a crime.

136. Goodman directs people to his COUNTER LAWFARE website, displaying *Goodman v. Bouzy* and “GEORGE WEBB” (SDNY), revealing the identity of a “Super Mario Brother”.



<https://www.youtube.com/watch?v=VQAFqyoliBA>



137. Counter Defendant and his CSTT enterprise (each of them) published discrete facts in such a way that they create a substantially false and defamatory impression by omitting material facts or juxtaposing facts in a misleading way.

138. Counter Defendant and his CSTT enterprise (each of them) published these discrete facts by innuendo, and that Counter Defendant and his enterprise intended or knew the implications that the public could draw from the allegedly defamatory material. These statements were published with a reckless disregard to the truth by the Counter Defendant on his enterprise and published with actual malice. The Counter Defendant's enterprise (each of them) intended to convey a false impression that the Counter Plaintiff had violated the Michigan Penal Code.

139. Counter Defendant and his CSTT enterprise (each of them) acted with negligence and actual malice to distribute these falsehoods. The Counter Defendant and his enterprise's implications that the Counter Plaintiff conspired with Richard Loury or "GEORGE WEBB" are materially false.

140. That Counter Defendant and his CSTT enterprise (each of them) published statements capable of interpretation by a reasonable listener as stating "actual facts" about the Counter Plaintiff, as opposed to statements of opinion.

EIGHTH CAUSE OF ACTION

Vicarious Liability Against Counter Defendant

141. Counter Plaintiff repeats, re-alleges, adopts and incorporates each and every allegation contained in Paragraphs 1 – 140, inclusive, as if fully restated herein.

142. In all of the tortious acts described in this complaint vicarious liability is imposed upon all CrowdSource The Truth CSTT enterprise components (each of them). There is a direct causal relationship between the tortious conduct of the CrowdSource The Truth CSTT enterprise and the Counter Plaintiff's injuries. The CrowdSource The Truth CSTT enterprise (each of the components) acted as legal entities, M.S.D.I. / 21st Century 3D and Agent Goodman. There was actual participation by the sole owner Goodman, using either M.S.D.I. or 21st Century 3D, in the tortuous corporate conduct. The sole owner participated in the wrongdoing and/or authorized such conduct and/or directed that such acts described above be done by his corporate proxies (the Counter Defendant's enterprise, each of them). Agent Goodman acted dependently in a manner that serves the interest of the CrowdSource The Truth CSTT enterprise creating a nexus between the Goodman's corporate responsibilities and the offensive acts described in this Counterclaim Complaint.

143. Although Agent Goodman specifically knew or reasonably should have known that his tortious activity under his control could injure Counter Plaintiff, the CrowdSource the Truth CSTT enterprise and Agent Goodman negligently failed to take or order appropriate action to avoid the harm as part of his official duties, and in his personal capacities, as an agent of M.S.D.I. / 21st Century 3D. An ordinarily prudent person, knowing what the sole owner of the CrowdSource The Truth CSTT enterprise knew at that time, would not have acted similarly under the circumstances. Therefore, under the doctrine *respondeat superior* liability is imposed upon M.S.D.I. / 21st Century 3D.

DAMAGES

144. Counter Plaintiff seeks damages and equitable relief on behalf of himself, which relief includes, but is not limited to, compensatory and punitive damages, an order enjoining Counter Defendant and his CSTT enterprise (all of them) from the use of the Counter Plaintiff's likeness, name and/or persona in social media podcasts, as well as Counter Plaintiff's future reasonable attorneys' fees and expert fees, and any additional relief that this Court determines to be necessary or appropriate to provide complete relief to Counter Plaintiff.

145. Counter Defendant and his CSTT enterprise (all of them) acts and conduct have caused damage to Counter Plaintiff and Counter Plaintiff is entitled to recover from Counter Defendant and his CSTT enterprise the damages sustained by Counter Plaintiff as a result of Counter Defendant and his enterprise's wrongful acts in an amount subject to proof at trial. Counter Plaintiff suffered from fear and confusion, self-doubt, anger, disbelief, shock, gloom, isolation, bewilderment as a direct and in direct of the Defendants enterprise (all of them) actions.

146. Counter Plaintiff seeks an order of this Court awarding damages, restitution, disgorgement, injunctive and/or declaratory relief and all other relief allowed.

Signed February 21st, 2023 (2/21/23)



**D. G. SWEIGERT, C/O
AMERICA'S RV MAILBOX, PMB 13339
514 Americas Way, Box Elder, SD 57719**

It is hereby certified that all attached exhibits are true and accurate copies of the originals.

I hereby attest that the attached public documents are true and accurate artifacts under the penalties of perjury. Signed February 21st, 2023 (2/21/23)

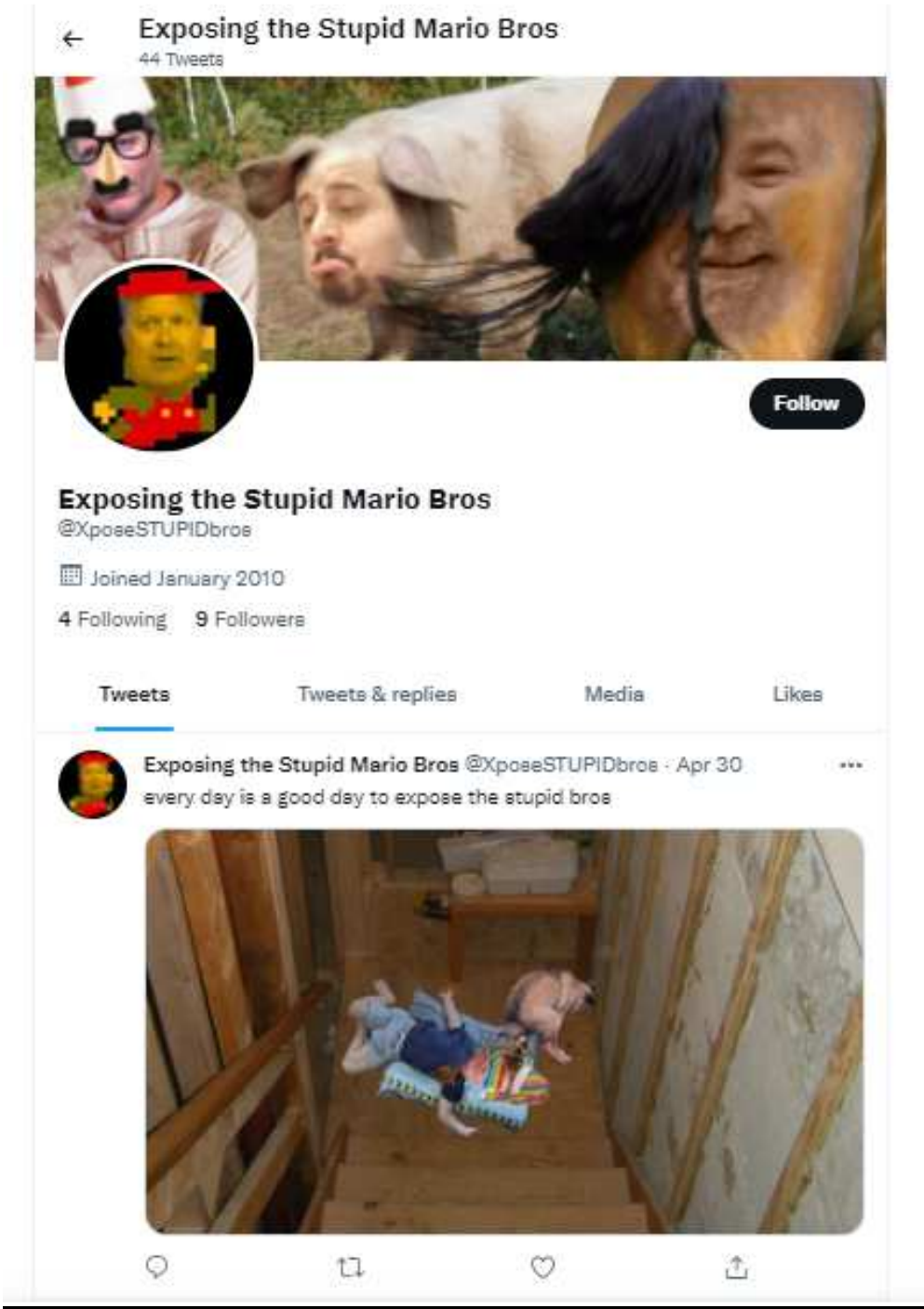


**D. G. SWEIGERT, C/O
AMERICA'S RV MAILBOX, PMB 13339
514 Americas Way, Box Elder, SD 57719**

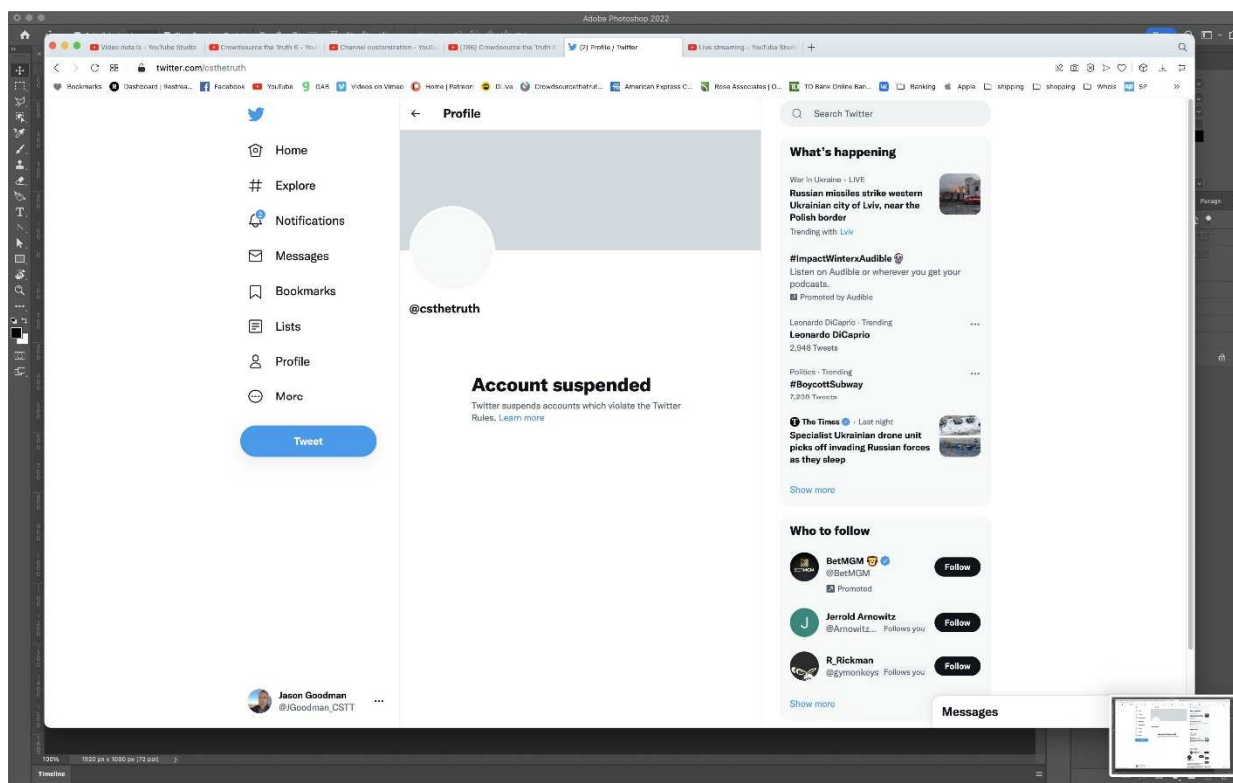
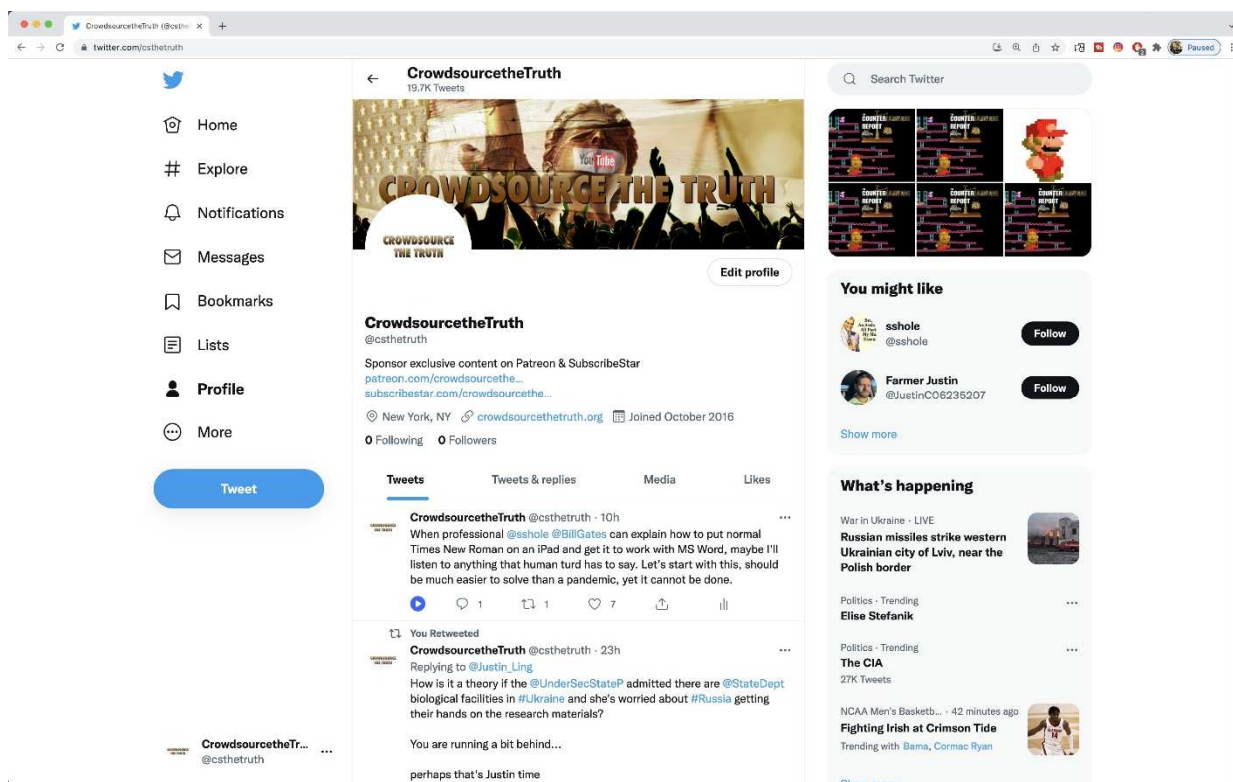
EXHIBITS

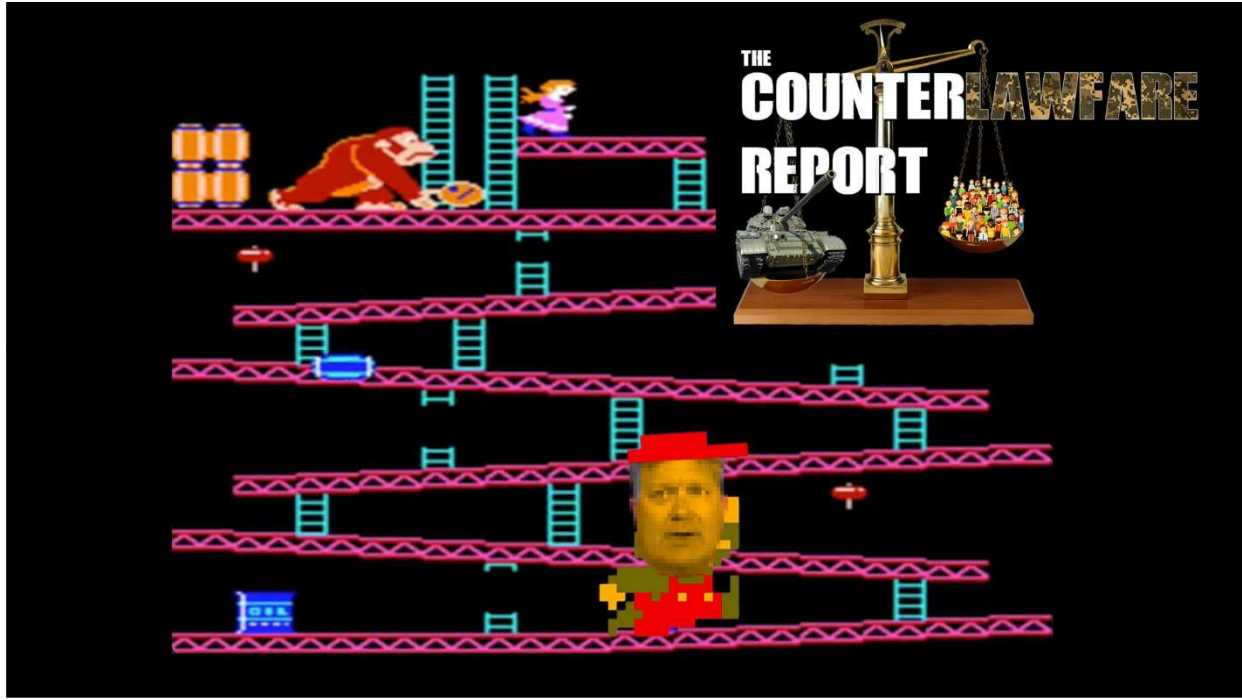
EXHIBIT ONE

https://twitter.com/XposeSTUPIDbros/with_replies









File 1: Uploaded as
"SweigertVCNNDrainSummons_PDF_
fillable2021.pdf", saved and attached
as "File_1_ProSe_20210617_16_11_
34_270.pdf"
Description: Summons Request

On Thu, Jun 17, 2021 at 4:07 PM [REDACTED]
[REDACTED] <[REDACTED]>
wrote:

Mr. Sweigert,

We have not received the document through
the Temporary Pro Se Document Upload
Program. We can not issue the Summons
until you correctly submit the document.

Best,

[REDACTED]

Pro Se Case Administrator

U.S. District Court - Eastern District of
Michigan

Direct Phone: (313) 234-5013

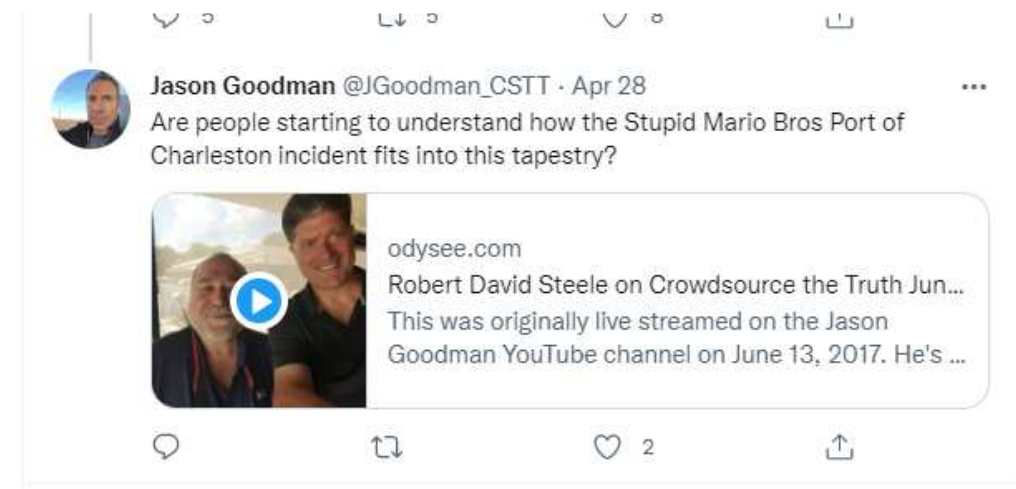
[\[REDACTED\]](#)

EXHIBIT TWO

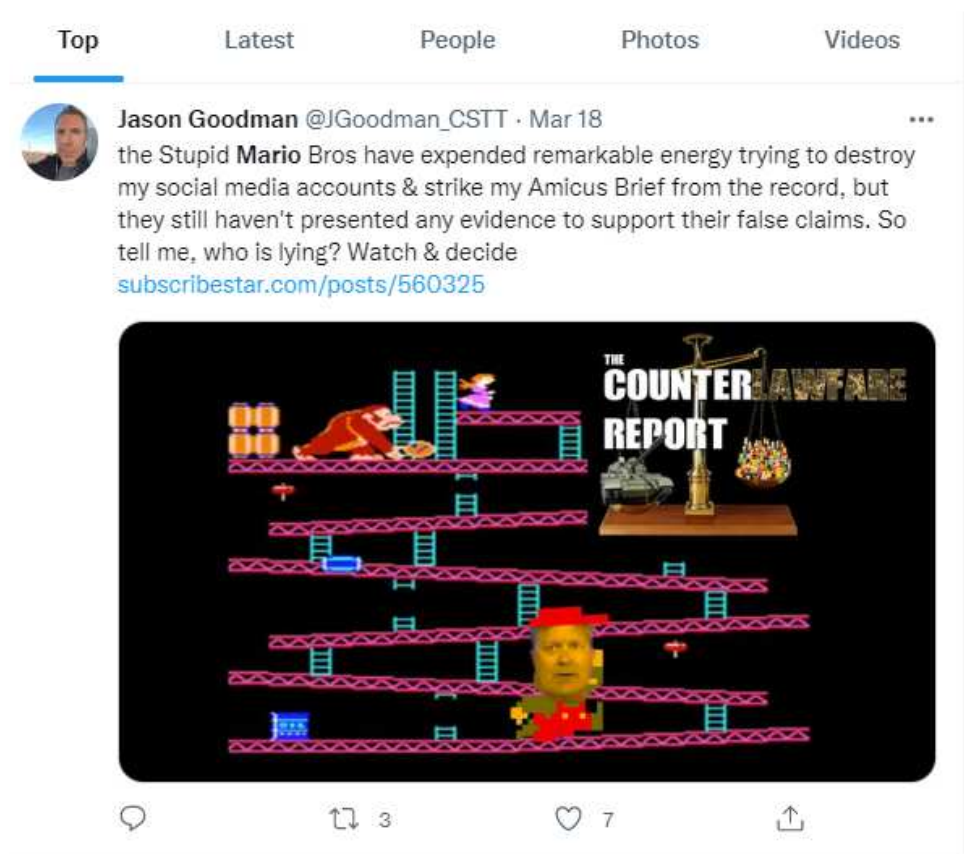
https://twitter.com/JGoodman_CSTT



https://twitter.com/JGoodman_CSTT/status/1519649224706637825



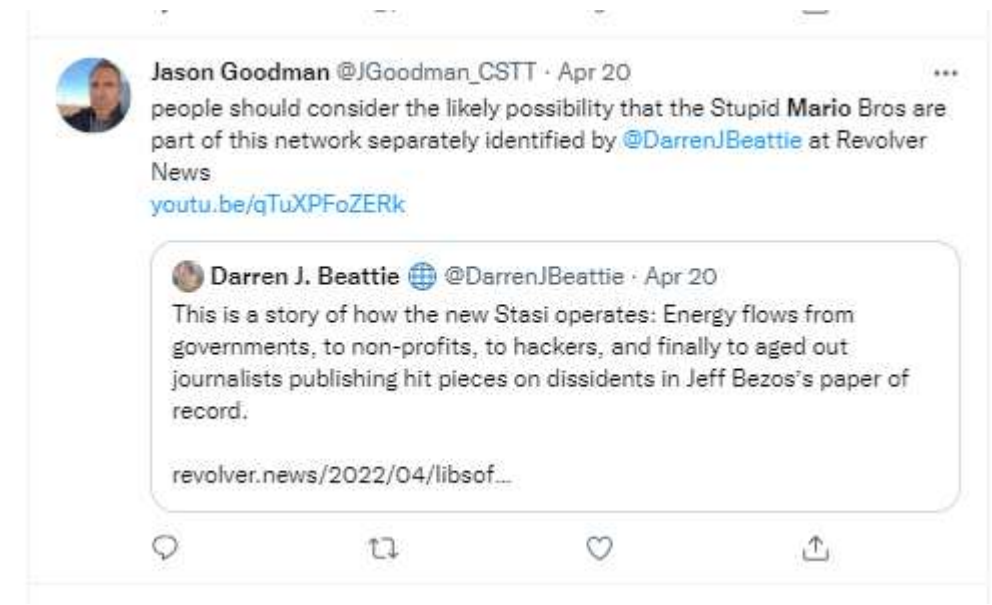
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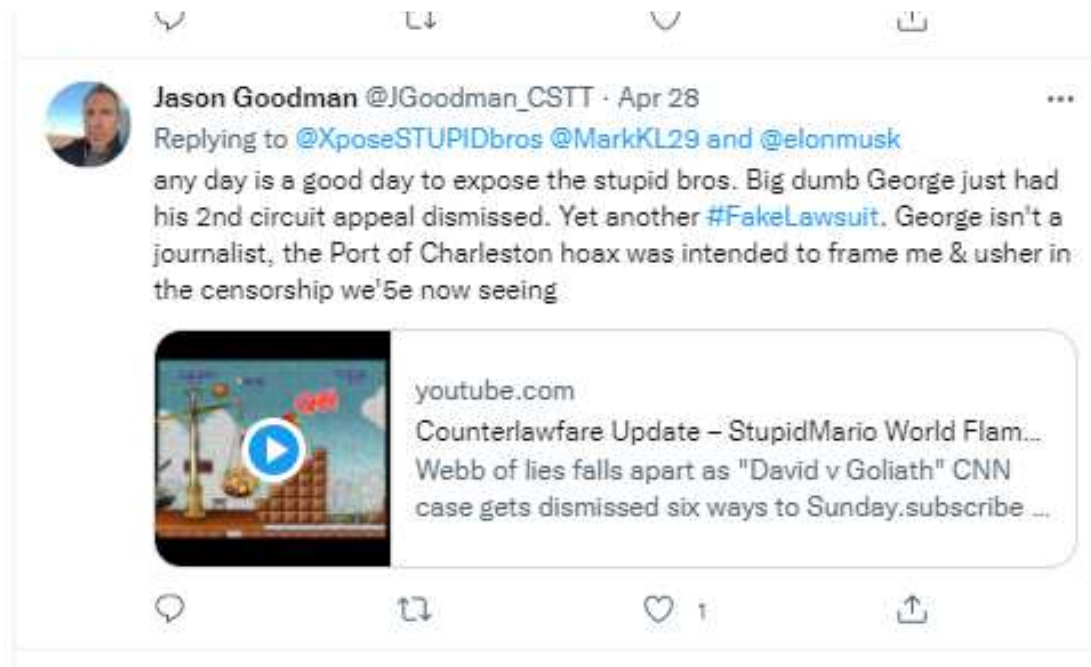
https://twitter.com/JGoodman_CSTT/status/1516050190314221570



https://twitter.com/JGoodman_CSTT/status/1516797415902302214



https://twitter.com/JGoodman_CSTT/status/1519798730379169793




https://twitter.com/JGoodman_CSTT/status/1503831461341900806




<https://twitter.com/XposeSTUPIDbros/status/1509641726557839370>








Jason Goodman
793 Tweets

Follow




Jason Goodman @JGoodman_CSTT · 2h
George Webb & his reprehensible brother are actively working to get [@OdyseeTeam](#) removed from the internet. These subversive operators are un-American enemies of free speech & should be jailed. Watch the Counterlawfare Report
[subscribestar.com/crowdsourcethe...](#)
[patreon.com/crowdsourcethe...](#)

You reported this Tweet. **View**

 1   1 



Jason Goodman @JGoodman_CSTT · 2h
don't email me saying GW is a journalist, he's a dangerous liar & he's part of the effort to destroy the U.S. Constitution & America itself. He's said in his own words he would always protect [@BarackObama](#) [#traitor](#) lots of unflattering evidence on Odysee



[odysee.com](#)
Getting the Big G out of the Big House v2 (original...
As everyone now knows, intrepid investigator George Webb was arrested on June 15, 2017 under...



   1 

EXHIBIT THREE

<https://www.youtube.com/watch?v=qTuXPFoZERk>



[Crowdsourcethe Truth 5](#)

Crowdsourcethe Truth 5

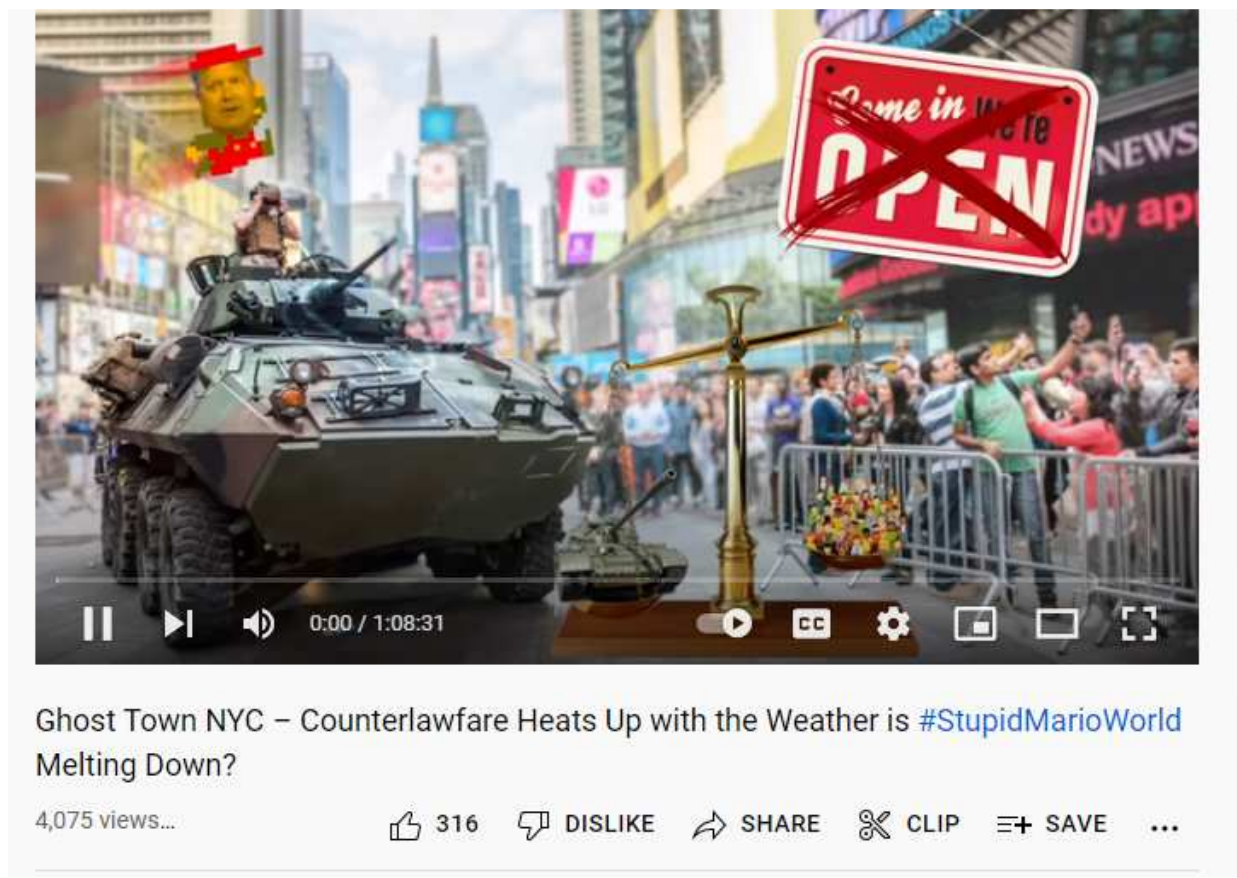
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EXHIBIT FOUR

<https://twitter.com/GHenryDickface>





<https://twitter.com/GHenryDickface/status/1519312008390270978>



GeorgeHenryDickface

@GHenryDickface

...

CIA Dave Acton court testimony



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EXHIBIT FIVE



<https://twitter.com/counterspoliati1>



<https://twitter.com/cheburashka1964>



<https://twitter.com/csthetruth>

EXHIBIT SIX

DECLARATION OF PRO SE COUNTER PLAINTIFF

147. The pro se Counter Plaintiff undersigned hereby states under the penalties of perjury that:

148. Contrary to the public declarations of Jason Goodman (“Goodman”) the undersigned does not maintain a collaborative relationship with his brother George Webb Sweigert (“Webb”).

149. Mr. Goodman has received copies of electronic messages sent to a wide variety of interested parties, to include Webb, under the auspices of litigation privilege in an attempt to encourage Goodman to cease his non-stop defamatory remarks appearing in social media podcasts concerning the undersigned.

150. To this end, the undersigned has never authored or ghost-written legal documents for Webb regarding any litigation within the U.S. District Court serving the Eastern District (M.I.E.D.) or in any other forum.

151. To this end, the undersigned has never entered the PRO SE ECF docket upload system as Webb, nor has uploaded documents on behalf of Webb, nor has fashioned documents for such an upload, not has created documents for such an upload.

152. Likewise, the undersigned knows nothing about interactions between Webb and M.I.E.D. employee Richard Loury (“Loury”), neither has the undersigned had interactions with Loury – except to include his e-mail address on messages which Goodman received as well.

153. To this end, the undersigned never collaborated with Loury concerning the uploading of any documents to the M.I.E.D. ECF PRO SE web portal, nor has fashioned any documents with the help of Loury or in communications with Loury.

154. The booklet known as the Certified Ethical Hacker's Field Operations Guide, authored by the undersigned, contains only one reference to an Adobe PDF file which appeared in the Uniform Resource Location (URL) of an Internet web address within the book. Otherwise, there is no discussion of Adobe PDF files in this book.

155. The undersigned is "not a professional hacker", as claimed by Goodman, but maintains the U.S. Department of Defense (DoD) recognized training credential Certified Ethical Hacker as defined by DoD Manual 8570.

156. The undersigned does not engage in any unauthorized access to any computer systems anytime and/or anywhere. "Hacking" is a term of art that indicates unauthorized access to a computer system or network. There are professional implications to being associated with the label "professional hacker", and such association has harmed the professional image of the undersigned.

157. The undersigned is aware that on July 20, 2021, Goodman filed an Amicus Curiae brief in support of defendant CNN's motion to dismiss in the M.I.E.D. (*See* Case 2:20-cv-12933-GAD-KGA ECF No. 20).

158. The undersigned denies that this Amicus Curia brief, nor it's amendment, presented evidence that suggests Webb and the undersigned conspired with a clerk of the court, Loury, to cause a fraudulent document to be filed on the docket, in violation of 18 U.S. Code § 1343, to attribute such document to Webb, but authored by Loury, and which outside the normal procedure of the M.I.E.D., as alleged by Goodman. The undersigned has no knowledge in such

matters and did not participate in this alleged conspiracy to create documents for the M.I.E.D. ECF docket..

159. The undersigned knows of no dynamic online collective which operates to harm Goodman except for personalities mentioned by Goodman during video broadcasts in 2017 to 2019 to include “DEFANGO”, Manuel Chavez, III of Carson City, Nevada, the wife of the attorney representing Steele in the Virginia legal actions, an apparent brother-in-law of the same attorney known as “Tyrone Simpson” apparently of New Mexico or Colorado. This clique was heavily reported on by Goodman in his broadcasts during the 2017 to 2019 period. The undersigned is not a member of this clique.

160. The undersigned does not, and has never coordinated a “Cyber Militia” force to consolidate any attacks on Goodman. The undersigned has written about the concept of a Cyber Militia in scholarly papers published in the 2013-time frame. The undersigned discussed the general concept of a Cyber Militia in two or three videos that were broadcast in the summer of 2017. The videos were designed to present scholarly research to a limited audience with an interest in such matters.

161. The undersigned is familiar with the concept of “mass reporting” from a large number of inauthentic social media accounts to create the false impression of public outrage and prompt. However, the undersigned has not organized or participated in such campaigns against Goodman. Signed this 21st day of February, 2023



D. G. SWEIGERT PRO SE, C/O
PMB 13339, 514 Americas Way,
Box Elder, SD 57719
Spoliation-notice@mailbox.org

CERTIFICATE OF SERVICE

It is hereby certified under the penalties of perjury that a true copy PDF file has been sent via e-mail message to the following:

Jason Goodman, sole stockholder of MULTIMEDIA SYSTEM DESIGN, INC.

truth@crowdsourcethetruth.org

And

Georg.webb@gmail.com

berlins@ballardspahr.com

mishkinm@ballardspahr.com

margaret.esquenet@finnegan.com

liz.lockwood@alilockwood.com

Certified under penalties of perjury. Signed this 21st day of February 2023. (2/21/23)



PRO SE DEFENDANT